



# Study on the (potential) role of qualifications frameworks in supporting mobility of workers and learners

European Commission and Australian Department of Education, Employment and Workplace Relations

## Joint EU-Australia Study



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## Executive summary

Countries are designing qualifications frameworks to improve the transparency and understanding of qualifications systems. Qualifications frameworks have features, such as the use of levels, level descriptors and learning outcomes, which make it easier to understand the structure of a qualifications system, the relationship between qualification types and they also create an opportunity to develop or structure existing qualifications databases. The increased transparency is expected to benefit learners, employers, counsellors and persons in other positions who need to understand people's qualifications nationally as well as internationally.

While a decade ago qualifications frameworks were a feature of only a few education and qualifications systems, over recent years many countries have decided to develop such frameworks. Australia has a long established qualifications framework (AQF) that has recently been revised. All European countries have either already implemented qualifications frameworks or are currently in the process of designing them. At European level, two meta-frameworks exist: the European Qualifications Framework for Lifelong Learning (EQF) and the Qualifications Framework for European Higher Education Area (QF EHEA). The role of these meta-frameworks is to relate national qualifications frameworks and to serve as translation tools. Countries reference their national qualifications frameworks or systems to the European meta-frameworks according to a set of commonly agreed criteria. There are no specific qualifications directly included in the meta-frameworks' levels, only the national qualifications frameworks or systems.

In this context of intensive developments in the area of qualifications frameworks, the European Commission and the Australian Department of Education, Employment and Workplace Relations, are engaged in a policy dialogue on this theme. Policy dialogue is a form of bilateral exchange on a topic of interest to the two parties with the aim of exchanging experience and good practice. It can result in joint actions. This report has been commissioned to feed into the policy dialogue. The objectives of this study were to:

- Collect and synthesise existing evidence about the role of qualifications frameworks in supporting mobility of workers and learners;
- Identify the existing obstacles in qualification recognition and discuss the potential and limitations of qualifications frameworks in this context;
- Outline the possibilities of and opportunities for linkages between the European Qualifications Framework and the Australian Qualifications Framework.

## Approach and methodology

To address the study objectives, the team followed a qualitative, exploratory and partly forward looking approach. Given the broad and diverse nature of the topic researched (the relationship between qualifications frameworks and mobility), the analysis relies on a limited set of primary or secondary data. Therefore the report cannot provide definitive answers to the questions asked. The data collection focused on nine countries (Australia and eight countries in the EU).

The main sources of information used were:

- Background information on trends in mobility of learners and workers;
- Existing research on mobility of these two groups in particular focusing on the role of and problems encountered with qualification recognition;
- Desk research covering national policies, policy documents and reports about the role of qualifications and qualifications frameworks for mobility and procedures concerning qualification recognition;
- Interviews with twenty two persons from organisations with different but active involvement in qualification recognition or mobility of learners and workers;
- Forward looking expert analysis of possible linkages between the EQF and the AQF.

The scope of the analysis was limited to the types of mobility that are likely to require qualification recognition. Consequently, for EU countries, emphasis was put on mobility outside the zone of free movement of EU-EEA citizens.

## Existing evidence about the role of qualifications frameworks in supporting mobility

Not all the nine countries analysed had a qualifications framework in place at the time of writing. The analysis found that in those countries with developed NQFs (Australia, Ireland, Malta and the United Kingdom), the levels and qualification types in the frameworks have become the 'benchmark' for judging foreign qualifications. They are not the only element of qualification recognition procedures but they do matter and make a difference. In some countries (Australia, Ireland and United Kingdom), those with established frameworks, the reference to NQFs and their levels has become part of the regulations for immigration policies. This shows that as qualifications frameworks become established elements of qualifications system, other policies and rules integrate them as a reference for situations where, in countries without NQFs, other types of reference (such as the type of education provision) is used.

Some frameworks are seen as having regulatory roles in supporting mobility of workers:

- In Australia, qualifications of persons who wish to migrate to Australia through the skills migration stream are allocated points according to the type of qualification in the AQF. Foreign qualifications of applicants for immigration are assessed against the AQF qualification types and their descriptors;
- In the UK, the definition of skilled and highly skilled persons is defined according to the UK NQF qualification levels.

In Ireland, the immigration regulations for workers are not explicitly related to the Irish NQF but the framework and related policies/structures has created a tool that supports systematic comparison of qualifications. Only persons with an employment offer are eligible for visa and it is for the employer to ensure that the qualification of the applicant is appropriate for the employment position. Employers may seek advice from the qualifications authority service on qualification recognition. This service holds a database with qualification types from most frequent application countries, which shows how the foreign qualification type compares to an Irish qualification type on the NQF.

Workers' migration in Malta concerns predominantly seasonal workers or low qualified persons. Qualification recognition is not seen as having a major role to play in these situations and the policy is not explicitly related to the NQF.

Concerning the mobility of students, in Ireland a person is only eligible for a student visa if they apply for a programme that leads to a qualification at level 5 of the NQF (equivalent to level 4 of the EQF) or higher. Furthermore only qualifications that are accredited to the NQF are eligible.

In other countries with established frameworks, these are used to support student mobility without having a regulatory role:

- The Maltese strategy for internationalisation of education emphasises the need to make sure that Maltese qualifications are broadly recognised. It sees the NQF as a core element for achieving this;
- The Australian strategy also emphasises the need for worldwide recognition of qualifications awarded in Australia but it does not make an explicit link with the AQF.

Education institutions ultimately decide on qualification recognition of foreign student applicants. To do so they can rely on the opinion of ENIC/NARIC centres on how a foreign qualification compares to the domestic criteria for access to a programme/level. ENICs/NARICs use information about qualification level as one of the elements of the comparison. They also use qualification databases which complement (or are an element of) NQFs where they exist.

In countries where NQFs are in the process of development it is not possible to gather any evidence on their use for mobility at this point in time. In most countries the NQF development phase is very much focused on the national dimension of frameworks and, at least in the countries studied, the aspect of international recognition is not at the centre of the current debate. EU countries that are developing their NQFs now are doing so with a view to reference their frameworks to the EQF. The EQF is not a recognition tool as such but it helps to compare qualifications in a transnational context and thus it is expected to influence recognition practices. These concrete expectations from NQF development for recognition have been noted:

- Improved recognition of vocational qualifications of which there is a great variety worldwide and which are more difficult to compare than the relatively homogeneous higher education qualifications; and,
- Improved recognition of certain types of higher education qualifications that are not common in other countries.

### Obstacles in qualification recognition

The following obstacles in qualification recognition of mobile students have been identified:

- Recognition of professional bachelor degrees in view of further study in countries where no equivalent qualifications exist is problematic; and,
- Diversity of practices and approaches among higher education institutions within the same country. Higher education institutions are increasingly developing their own centres/units for foreign qualification recognition. They are at the same time creating their own practices in this area which are not always in line with the internationally agreed procedure.

Research on the degree of recognition of qualifications and credit for further studies is rare. In one country studied where such research exists (Germany), the proportion of people with sub-optimal recognition and those dissatisfied with the result is relatively high.

Recognition of mobile workers' qualifications appears particularly difficult. Research evidence indicates that mobile workers are frequently over-educated for the work they carry out. This situation is not solely due to lack of qualification recognition. Language skills of the host country are a major obstacle and other issues, such as obsolescence of qualifications or lack of professional networks are also a major factor influencing their labour market insertion. Nevertheless, these issues particularly related to qualification recognition were identified in certain countries:

- Lack of legal frameworks and non-existence of procedures to actually entitle and enable foreign workers (from outside the EEA) to get their qualifications recognised;
- Lack of employers' understanding of foreign qualifications (with the exception of those companies that have highly professionalised international recruitment services) and low awareness of the existence of recognition services where these exist; and
- Lack of a network similar to that of ENICs/NARICs that would support exchange of information about vocational qualifications in view of their recognition.

### The potential and limitations of qualifications frameworks to improve recognition

The study makes the following synthesis of the main potential advantages as well as limitations to improve qualification recognition in a context of growing and more and more diverse workers' and student mobility:

1. NQFs give information about qualification level and this is an important dimension for understanding qualifications. However, level is only one dimension needed for qualification recognition, other aspects are also important. NQF levels are therefore a first step in evaluating a foreign qualification, especially for formal recognition.
2. Qualifications frameworks can clarify information about other technical dimensions of qualifications such as workload, learning outcomes and type of qualification. These technical dimensions are important for formal recognition. Informal recognition by employers does not require this detailed information and is often influenced by aspects such as reputation or familiarity with a system.
3. It will take time before frameworks become widely established – this breadth of use is a requirement for their use for recognition.
4. There seems to be a willingness to ensure that coherent formal recognition strategies are carried out by designated bodies with clear and transparent procedures and with a facility for appeal against decisions made (for example Denmark or Ireland). In Australia this procedure is strongly linked to immigration. Consequently, qualifications frameworks could have a stronger role to play in bringing coherence to recognition strategies.

5. There is likely to be continued growth in the demand for formal as well as ‘informal’<sup>1</sup> recognition of foreign qualifications (there is growing student and workers’ mobility). The demand concerns a variety of qualifications systems, types and fields of study and thus requires the use of systematic tools (such as frameworks) for recognition.
6. There is a possibility that countries will increasingly put in place stronger linkages between qualifications recognition and immigration rules thus creating more demand for qualification recognition.
7. Greater demand could bring greater familiarity with foreign qualifications, greater development of international databases on comparability of qualifications, and the detailed procedure of qualification recognition may become less used.
8. Frameworks will lead to internal clarification of relationships between qualifications, which will have positive effect on the way qualifications from a given system are presented abroad.
9. The main reference for recognition is the host country qualification system. Therefore, if no equivalent qualifications exist in the host system (in terms of type or profile), it remains difficult to actually recognise a qualifications as an equivalent to an existing host country qualification. However, some countries issue statements about the level at which the incoming qualification could be placed in the host system even if there is no equivalent qualification in the host country.
10. If the NQF development process focuses solely on the relationships between qualifications within a country, there is a risk of inconsistencies developing in positioning of qualifications in transnational terms. Some qualifications, in particular school-leaving general education qualifications, are already, in practice, broadly recognised as equivalent for access to higher education. If the NQF developments place these at levels that do not compare such development could be counter-productive.
11. Frameworks are closely associated with the existence of databases or registers of qualifications. These are useful tools for qualification recognition. They provide summary information on aspects such as: the content of the qualification, the profession(s) for which it prepares, or the fact that the qualification is nationally recognised.
12. To make frameworks become part of the toolbox for qualification recognition, there is a need to communicate to a range of actors in charge including employers and HEIs. Their awareness of and understanding of frameworks cannot be taken for granted.
13. There is a need to provide information about qualification recognition possibilities and opportunities to the individuals. This will not be achieved by the frameworks alone and there is a risk that frameworks might lead to the misunderstanding of the general role of NQF levels. For example individuals could take them at face value and presume they offer entitlements.
14. An important element for qualification recognition is the profession for which a qualification prepares or information about what the qualification enables a person to do in his/her own country. This is not captured by qualifications frameworks even though it can be at least partly reflected in the learning outcomes used and encouraged by the use of frameworks. It is also possible for qualifications frameworks, in particular the qualifications databases or registers that underpin these, to be related to labour market information systems.
15. Qualifications frameworks are often underpinned by quality assurance procedures. These can improve trust and hence qualifications recognition. But this can only work if these quality assurance procedures are solid and transparent.
16. Qualification recognition is somewhat difficult in the area of vocational or professional qualifications as there is a greater diversity of systems and structures among countries. Qualifications frameworks are expected to improve the legibility of foreign qualifications systems and thus better appreciate these qualifications.

### Possibilities and opportunities for linking AQF and EQF

It is highly unlikely that two major frameworks such as the EQF and the AQF would co-exist without any sort of linkages developing, especially given the high mobility flows between Europe and Australia. Sooner or later, some form of linkages will develop, formally or informally. Some links already exist, as some European NQFs (Ireland) or some systems (that are referenced to the EQF) have identified how the AQF relates to the NQF or how AQF qualifications (e.g. in the Danish

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<sup>1</sup> Informal recognition refers to recognition that does not result in an official paper/document which states that a given foreign qualification is recognised in the host country but for example the recognition done by employers at recruitment

qualifications recognition database) refer to the national qualifications system. Therefore the question is rather about the nature of the linkages and their status. Furthermore, there could be a policy opportunity in linking the two frameworks and thus strengthening their visibility and potential impact.

The study identifies ten possibilities for linking the two instruments (see table below).

Possible approach to linkage	Outline
<b>1. Full legal linkage</b>	The AQF links to the EQF in the same way as an NQF from an EU Member State, following the requirements of the EQF Recommendation of 2008.
<b>2. Mutual recognition</b>	Each framework authority endorses the other in terms of its own framework, meaning that each of them issues a statement which concerns how the other framework relates to the home framework. A common declaration is made.
<b>3. Bilateral declaration</b>	Each framework authority endorses the other in terms of its own framework. Each makes an independent declaration
<b>4. Unilateral declaration</b>	A framework authority uses evidence to make a statement about linkage to another framework
<b>5. Promotion and engagement</b>	No formal level-to-level linkage but cooperation at expert level, research and reports, mutual promotion of the other framework. Could lead to a <i>de facto</i> alignment based on custom and practice.
<b>6. Independent review</b>	Research is commissioned from an international body to look at linkage and a report is published
<b>7. Sector by sector linkage</b>	Partial framework links in an education and training sector, for example higher education, VET or general education
<b>8. Bilateral periodic review</b>	On a periodic basis, authorities cooperate to review the informal relationships between the frameworks
<b>9. Extended dialogue</b>	Ongoing dialogue between framework leaders on the relationships between the frameworks
<b>10. Laissez faire</b>	Allow informal linkages to develop

This speculative analysis indicates that it is possible to establish a direct, formal level-to-level 'technical' link between the two frameworks. This would be the most formal linkage option. At the other end of the spectrum is the possibility of a linkage that is based on informal arrangements made by individuals, private companies, learning institutions and any other entities that consider a relationship between levels in the two frameworks helpful for them.

The possibilities for linking the AQF and the EQF are many but for any of them to be useful for practitioners and users, it is necessary, for the sake of all users, to enable the establishment of a zone of trust between the two frameworks. In such a zone of trust, the established linkages should acquire general support from governments, its agencies, businesses that recruit across boundaries, providers of learning and the range of less formal users of qualifications and levels.

The two frameworks have much in common, but there are also major differences that are discussed in this report. The uses of the two frameworks are also fundamentally different and are a response to the national and international settings in which they have been developed. For example the EQF relates to a single labour market in a group of countries where there is free migration, the AQF by contrast relates to a labour market where controlled recruitment from abroad is the norm, qualifications recognition is an active and crucial element in the Australian immigration process.

The analysis suggests that a relationship between EQF and AQF would add value for both framework communities and the option of doing nothing and allowing potentially confusing informal relativities to develop is not in the interests of either region.

The main conclusion reached by the study suggests that a common statement ('Qualification Framework Accord') should set out the possibilities and the limitations of a programme of constructive engagement between the stakeholders of the two frameworks. This study identified the opportunities and possible options. It is now for the policy makers and the stakeholders to assess which options are

most desirable as well as feasible. The primary objective of the statement should be exchange and the building of trust and understanding. It is possible, but by no means certain, that a formal level-to level linkage between the two frameworks could emerge from this engagement and trust building. The different options need to be critically assessed and that should be researched through a participative exchange of stakeholders concerned.

In summary, the exploration of possibilities for developing a relationship between EQF and AQF, as set out in this study, leads to the conclusion that:

- There are significant potential gains for both Europe and Australia in developing an appropriate relationship, possibly termed a 'Qualifications Framework Accord' between EQF and AQF;
- The option of doing nothing and allowing potentially confusing informal relativities to develop is not in the interests of either region;
- The establishment of a linkage along the lines of a Qualifications Framework Accord involving these frameworks is technically feasible;
- The Qualifications Framework Accord would be a signal of the intention to develop a zone of trust as the EQF project moves to completion and AQF's new system of levels, titles and qualification types becomes embedded in national practice.

The use of level in qualification recognition is shown to be just one element in the recognition procedure; the report suggests that there would be value in exploring how a common language for the other important recognition factors (such as qualification types, learning outcomes, credit, professions etc.) might be developed.

Some key questions arise from the report that need to be examined in depth, for example which of the scenarios in the table above holds most value when all factors such as added value, risk and resources are taken into account?

# 1 Introduction

This final report presents the findings of the joint EU-Australia study on the potential role of qualifications frameworks in supporting the mobility of students and workers. The study followed an exploratory approach and looked in particular into the following issues:

- The (current) role of qualifications and qualifications frameworks in supporting the mobility of students and workers;
- The existing obstacles in qualification recognition;
- The potential and limitations of qualifications frameworks in this context;
- The possibilities of and opportunities for linkages between the European Qualifications Framework and the Australian Qualifications Framework and their contribution to mobility.

The study is a joint effort of the European Commission, Directorate General for Education and Training and the Australian Department of Education, Employment and Workplace Relations. Both institutions contracted experts to carry out the necessary analysis. The two teams have worked jointly to produce a single study.

This report is structured as follows:

- |           |   |
|-----------|---|
| Section 2 | Presents the policy context for this study in particular the qualifications framework development in Europe and Australia and the international dimension of these instruments; |
| Section 3 | Gives an overview of the approach followed, including the definition of the scope and terminology; and the methodology used;  |
| Section 4 | Presents the main trends in the mobility of students and workers in the countries studied the implications of these trends for qualification recognition;                       |
| Section 5 | Provides an overview of the national policies to attract foreign students and workers and the role of qualifications in this context;   |
| Section 6 | Discusses what works well and what issues remain in qualification recognition of mobile persons;  |
| Section 7 | Synthesises the implications of the evidence on the role of qualifications recognition and of qualifications frameworks in the mobility of learners and workers;                |
| Section 8 | Discusses the possibilities and added value of EQF-AQF linkages;  |
| Section 9 | Presents the recommendations arising from this analysis.  |

## 2 Policy context

The portability of individuals' qualifications and recognition of their competences is of importance for the economies and societies in Europe as well as Australia. The variety and increasingly non-linear character<sup>2</sup> of the life trajectories of people creates demand for instruments and tools that enable the recognition of competences across systems and working and learning environments. Recognition of qualifications is seen as a means for both: effective use of human capital and securing the career paths of individuals. The 'signalling' effect<sup>3</sup> of qualifications diminishes as people move to an environment where the qualifications they possess are not common and hence not known. This can be a national issue, when people move from one region, federal state to another or from one economic sector or company to another. But it is also an issue internationally, when people are mobile across countries and continents.

Qualifications frameworks are expected to be one of the tools for better recognition of qualifications. They should be transmitting the 'signal' that qualifications possess to those who need to receive it. Progressively, qualifications frameworks, systems and related instruments and policies are also developing a common language so that the signalling through qualifications about persons' knowledge, skills and competences is becoming more unified<sup>4</sup>.

Over the past decade a lot of policy developments have taken place in the area of qualifications frameworks within Europe and worldwide<sup>5</sup>. Australia is one of the few countries that has a long standing experience of using a qualifications framework. The research on qualifications frameworks has also grown recently<sup>6</sup>, contributing to improving the understanding of these instruments, the ways they operate and progressively also about their effects and impacts<sup>7</sup>. However, most of the discussion has concentrated on the role of qualifications frameworks within countries, even though the potential role of these instruments internationally has been recognised since the early stages of development<sup>8</sup>. This joint EU-Australia study was commissioned to explore the role that qualifications frameworks are playing and could play in the future in the context of transnational mobility of workers and learners.

This section gives a brief description of the policy background to this study. This is necessary to understand the objectives of this analysis and its role as part of the policy dialogue between the European Commission and Australia.

### 2.1 Qualifications frameworks in European education and training policy: Key points

While a few European countries have more extensive experience with the use of qualifications frameworks (namely UK and France), the development of qualifications frameworks in Europe is a relatively new phenomenon than in comparison to most other countries. Several countries started developing qualifications frameworks in the early years of the past decade but the development and adoption of the European Qualifications Framework (EQF – adopted in 2008 but in development since 2005) has provided strong impetus for the design of national qualifications frameworks across the EU. In parallel, the adoption of the Qualifications Framework for European Higher Education Area (EHEA), as part of the Bologna process (adopted in 2005 in development since 2002), led to reflection

<sup>2</sup> For a discussion on the changing nature of trajectories see for example Institute for regional innovation and social research (2004)

<sup>3</sup> For a summary of the signalling theory and implications for the role of qualifications see for example CEDEFOP (2010 a) p.44

<sup>4</sup> Idem

<sup>5</sup> See for example: ETF (2006); ETF (2011); ILO (2009 a)

<sup>6</sup> See the above publications but also OECD (2005 a); ILO (2009 b) ; CEDEFOP (2010 b)

<sup>7</sup> See for example ILO (2009 a)

<sup>8</sup> See for example European Parliament and the Council (2008) or Bjornavold Jens and Coles Mike (2010)

on the role of frameworks in the area of higher education. Some countries have developed qualifications frameworks covering higher education qualifications only. As of 2011, all EU countries are developing overarching qualifications frameworks that cover all sectors of education and training<sup>9</sup>. Where a separate higher education framework exists or is being developed, this is at the same time related to an overarching framework (in the form of a sub-framework for example).

A key characteristic and a specificity of the European qualifications frameworks and systems' landscape is the existence of two levels of frameworks: European meta-frameworks which act as a common reference and national qualifications frameworks (NQF) which are rooted in the specificities of national systems. In brief, the use of qualifications frameworks in Europe can be characterised by the following structures and state of development:

- **The existence of two European meta-frameworks**, of which one (The European Qualifications Framework for Lifelong Learning - EQF) covers all sectors of education and training and potentially all forms of learning and the second covers higher education qualifications only (the Qualifications Framework for European Higher Education Area – QF EHEA<sup>10</sup>). These meta-frameworks are compatible: they are both based on the use of learning outcomes to define qualifications and their levels. The levels six, seven and eight of the EQF are compatible<sup>11</sup> with the three cycles of the QF EHEA (the short cycle is compatible with the level five of the EQF), however it is broader, meaning that they can also encompass other qualifications than those issued by the higher education sector. But the two meta-frameworks also have some differences. The main difference being that the QF EHEA builds on another element of the Bologna process which is the implementation of the three cycles in higher education systems. In general terms, the three cycles of the QF EHEA correspond to the three main qualifications/degrees in higher education: namely the bachelor, masters and PhD. The three cycles of the QF EHEA are implemented at the national level. The eight levels of the EQF are not expected to be implemented at national level, they are reference levels only.
- **NQF development is a relatively new and an ongoing process**. As of early 2011 only a few European countries had overarching national qualifications frameworks in place, some others had sectoral (higher education or vocational education and training) frameworks in place. But all countries were developing overarching national qualifications frameworks<sup>12</sup>. For most EU countries, the process of NQF development is taking place in parallel to other related reforms such as the use of learning outcomes (to define qualifications, curricula, assessment, etc.) and the strengthening of quality assurance.
- **Predominance of NQFs that have mainly a 'communication role'**. Previous research distinguished between qualifications frameworks that have as an objective to reform the qualifications system in a country and those that aim to communicate the already existing features of the qualifications system<sup>13</sup>. In the current state of development, many NQFs in Europe have a predominantly communication based role (the regulation of qualifications systems is ensured through separate legislations and instruments)<sup>14</sup>, a feature that is shared with the Australian Qualifications Framework.
- **Variety of governance processes**. Another key feature of qualifications frameworks is the way in which these are governed<sup>15</sup>. In many English-speaking countries (including

<sup>9</sup> For more information about NQFs in Europe see CEDEFOP (2010 d)

<sup>10</sup> This framework is also sometimes referred to as the Bologna Framework

<sup>11</sup> This compatibility is based on the level descriptors in the EQF and the QF EHEA and it is rooted in the EQF Recommendation which is the document that defines the EQF European Parliament and the Council (2008)

<sup>12</sup> CEDEFOP (2010 d)

<sup>13</sup> See for example Raffe David (2009); CEDEFOP (2010 b) distinguishes between the passive (description of the system, communication) and active role (new rules and procedures) of qualifications frameworks.

<sup>14</sup> CEDEFOP (2010 d)

<sup>15</sup> See Castejon Jean-Marc, Chakroun Borhène, Coles Mike, Deij Arjen and McBride Vincent (2011) or Tuck Ron (2007)

Australia) it is common that the qualifications framework is governed by an independent agency that is accountable to the government<sup>16</sup>. However, many EU countries developing qualifications frameworks are, at least for the moment, not setting up such agencies and the NQF governance is ensured by ministries or inter-ministerial groups<sup>17</sup>.

As said earlier, the European meta-frameworks were designed as translation tools between diverse national qualifications systems. Instead of having a multiplicity of bilateral agreements and relationships between NQFs, the national frameworks or systems<sup>18</sup> are referenced to the European meta-frameworks which serve as a 'reading grid' to understand foreign qualifications systems. The referencing process follows a set of common criteria<sup>19</sup> and is monitored by a body composed of representatives of 31 countries as well as European social partners and main stakeholders (EQF Advisory Group<sup>20</sup>). Only a few countries have referenced their qualifications frameworks to the EQF as of mid-2011 (Belgium-Flanders, Denmark, France, Ireland, Malta, Portugal, United Kingdom)<sup>21</sup> and most are planning to do so in the near future (see also Table 2.1).

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<sup>16</sup> See for example the role of qualifications authorities in Tuck Ron (2007)

<sup>17</sup> CEDEFOP (2010 d). Similar developments can be noted outside Europe see Castejon Jean-Marc, Chakroun Borhène, Coles Mike, Deij Arjen and McBride Vincent (2011)

<sup>18</sup> Countries can reference their qualifications systems (by proceeding through qualifications types for example) to the EQF. They do not have to have qualifications frameworks in place provided that the referencing complies with the commonly agreed criteria – see below.

<sup>19</sup> *Criteria and procedures for referencing national qualifications levels to the EQF*. A discussion of the referencing criteria can be found in Coles Mike et al (2011)

<sup>20</sup> The mandate of the EQF Advisory Group is to ensure that EQF is implemented in a transparent and coherent manner. See the European Parliament and the Council (2008)

<sup>21</sup> France, Ireland, Malta and United Kingdom, see European Commission DG Education and Culture EQF website [http://ec.europa.eu/education/lifelong-learning-policy/doc44\\_en.htm](http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm) or [http://ec.europa.eu/eqf/home\\_en.htm](http://ec.europa.eu/eqf/home_en.htm)

Table 2.1 State of NQF development in the EU-27

	NQF	EQF ref		NQF	EQF ref
AT			IE	Advanced stage of implementation	Yes
BE fr			IT		
BE nl	Adopted but not yet fully implemented	Yes	LT	Adopted but not yet fully implemented	
BG			LU		
CY			LV		
CZ	Adopted but not yet fully implemented		MT	Adopted but not yet fully implemented	Yes
DE			NL		
DK	Adopted but not yet fully implemented	Yes	PL		
EE	Adopted but not yet fully implemented		PT	Adopted but not yet fully implemented	Yes
EL			RO		
ES			SE		
FI	Adopted but not yet fully implemented		SI		
FR	Implemented - being reviewed	Yes	SK		
HU			UK	Implemented	Yes
	Designing or testing			Adopted NQF	

Source: Cedefop (2010d)

When it comes to the core concepts and principles of NQF development in Europe, the following can be observed:

- All qualifications frameworks in Europe are or are being developed based on the **use of levels of learning outcomes**. This enables the alignment of qualifications from different education and training sectors. This process is related to the fact that most countries are progressively implementing an approach to define qualifications that will be based on learning outcomes as opposed to defining qualifications only by using the duration of studies and teaching content. This is a progressive process and the extent to which learning outcomes are already used varies from one qualifications system (even sub-system) to another.

This move to learning outcomes does not mean that there will not be any reference to education programme duration and content in the definition of qualifications in the future. Typical programmes would most likely still be defined by the competent authorities, but these would not constitute the main reference for defining the qualification. People would be able to demonstrate that they have achieved the learning outcomes through channels other than these typical programmes.

- The qualifications framework development is parallel to the development of approaches to **validate and recognise learning outcomes achieved outside formal education and training** (through work, leisure volunteering, etc.).

- There is a strong willingness among EU countries to use the NQF development as one of the aspects of **lifelong learning strategies**. NQFs are expected to enable the development of pathways across different education and training systems and sub-systems.
- **Use of credit is not a requirement in most NQFs**. Publications about NQFs often discuss the relationship between frameworks and credit systems that complement NQFs by creating a mechanism to express the size of qualifications/volume of learning<sup>22</sup>. So far, only a few European countries directly link the use of credit points with overarching NQFs (for example, UK or Slovenia<sup>23</sup>). The use of credit in European countries is already generalised in higher education, where most countries adopted the use of the European Credit Transfer and Accumulation System (ECTS)<sup>24</sup>. A minority of countries already use credit in vocational education and training (for example Finland, Slovenia or Romania). Others are reflecting on this issue in the framework of the implementation of the European Credit System for Vocational Education and Training (ECVET)<sup>25</sup>. The FQ EHEA explicitly refers to credit (using ECTS) and it defines the size of qualifications in each cycle<sup>26</sup>. The EQF levels and their descriptors do not refer to credit.

## 2.2 Australian Qualifications Framework in Australian education and training policy

The Australian Qualifications Framework (AQF) is the single quality assured national framework of qualifications in the schools, vocational education and training (VET), and higher education sectors in Australia. The AQF is the central element in Australian national policy in relation to qualifications; it is a policy matrix bringing all of Australia's education and training qualifications into one comprehensive framework, which underpins the Australian qualification system. The AQF defines the relationships and pathways between qualifications through descriptors and guidelines for each qualification and through policies regarding the issuance of qualifications and accreditation arrangements. However, as Australia is a federal country<sup>27</sup>, the use of AQF qualifications and adherence to AQF requirements is underpinned by legislation in each state and territory for the accreditation of qualifications and the registration of providers to issue the qualifications.

The AQF was introduced on 1 January 1995 and was phased in over five years, with full implementation by the year 2000. It replaced the previous Register of Australian Tertiary Education (1990-1995) that referenced qualifications in the VET and higher education sectors. In 2009-2010 a process has been undertaken to strengthen the AQF by developing and introducing a more contemporary architecture for the framework.

The architecture for the AQF described here is the strengthened AQF, which has been endorsed by ministers and formally introduced into the system, and is being implemented as of July 2011. The main features of the AQF are:

- The AQF is a framework of 10 Levels;
- AQF Levels Criteria define the learning outcomes appropriate to qualifications at each level;
- The AQF also defines 14 qualification types; each qualification type descriptor includes an indication of the volume of learning outcomes involved.

<sup>22</sup> See for example Castejon Jean-Marc, Chakroun Borhène, Coles Mike, Deij Arjen and McBride Vincent (2011) or Tuck Ron (2007), CEDEFOP (2010 b)

<sup>23</sup> CEDEFOP (2010 d)

<sup>24</sup> Eurydice (2010)

<sup>25</sup> CEDEFOP (2010 c)

<sup>26</sup> Each cycle is defined through an qualitative criterion: learning outcomes as well as a quantitative criterion: the size of the qualification in terms of ECTS (this is defined as a range – for example between 180 and 240 ECTS for first cycle qualifications).

<sup>27</sup> In the Commonwealth of Australia, responsibility for education and training is shared between the Australian Government and state and territory governments.

In the AQF, the framework architecture is based on levels defined in terms of the learning outcomes expected from a learner who is to receive an award. The way learning outcomes are described is therefore a crucial characteristic of the AQF, which sets out explicitly the taxonomy of learning outcomes used as the basis of the levels definitions, in three dimensions: knowledge, skills and the application of knowledge and skills.

The AQF structure is supported by a coherent set of policies through which the framework will be operationalised. In addition to revised specifications for developing and accrediting qualifications, the strengthened AQF model includes:

- a revised policy for issuance of qualifications
- a revised policy on qualifications pathways
- a revised policy for the register of AQF qualifications
- a new policy for the addition or removal of qualification types, and
- a new glossary of terminology.

In addition, Australian qualifications are underpinned by a matrix of quality assurance arrangements tailored to the needs of each of the sectors of education and training.

When the AQF was originally introduced in 1995, the then Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) established an AQF Advisory Board, which was replaced in 2008 by the **Australian Qualifications Framework Council (AQFC)**. The AQF Council itself is not a statutory body but an advisory body. Its functions relate to the technical development and management of the qualifications system in Australia and to the provision of expert advice to the Standing Council on Tertiary Education, Skills and Employment (SCOTESE). Accreditation and registration functions are currently undertaken by state and territory governments; but under new arrangements agreed by all levels of government, these functions will be taken over by national regulatory bodies which are to be established for VET and higher education.

The role of the AQF Council is to provide Education and Training Ministers with authoritative advice on the strategic strengthening of the AQF; on developing flexible qualification linkages and pathways; on national and international issues with implications for national qualifications policy; and on national and international recognition, comparability of qualification standards and alignment of qualifications standards/frameworks. The Council also has a range of functions relevant to the management and implementation of the AQF<sup>28</sup>.

### 2.3 AQF – EQF comparison

Certain similarities and differences between the AQF and the EQF are easily apparent. Looking at the differences:

- AQF is a national qualifications framework to which Australian qualifications can be directly related; EQF is a meta-framework to which national systems can be referenced – no qualifications are directly related to the EQF.
- AQF relates to one country (albeit a vast and complex country, a Commonwealth of States); EQF is a regional structure relating to many countries with very different governing arrangements, different education traditions and different languages.
- AQF defines qualifications types, whereas EQF does not.
- AQF defines the volume of learning outcomes associated with qualifications types; EQF has no volume metric (credit).

The fact that AQF has ten levels, whereas EQF has eight, is not a significant difference. Some of the EU countries that are referencing to the EQF have, or are developing, national

<sup>28</sup> The mandate of the Council can be found here [Australian Qualifications Framework Council \(2008\)](#)

frameworks with fewer or more levels than eight, and this has proved not to be a difficult issue in the referencing process<sup>29</sup>.

In looking at the similarities between AQF and EQF, it becomes evident that these frameworks have much in common:

- Both frameworks are structures of levels defined in terms of learning outcomes and set out in grids or tables;
- In both frameworks, the level descriptors are designed to be read across all three strands of learning outcomes;
- In both frameworks, the outcomes for a given level build on and subsume the outcomes for the levels beneath;
- The basic taxonomies of learning outcomes adopted by the two frameworks are remarkably similar;
- Neither framework has an in-built credit mechanism;
- Both frameworks are neutral in regards to the field of learning or mode of learning; and
- Both frameworks are comprehensive, designed to accommodate all qualifications, recognising learning achieved in all sectors including non-formal and informal learning, on a lifelong learning basis.

This amounts to a very significant degree of correspondence between these two different frameworks in terms of their underlying conceptual bases, definitions of terminology and general approaches to the recognition of learning achievement.

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<sup>29</sup> See for example the referencing reports of Ireland, UK or France: [http://ec.europa.eu/eqf/home\\_en.htm](http://ec.europa.eu/eqf/home_en.htm)

Table 2.2 Summary of key features of AQF and EQF

	EQF	AQF
<b>Framework type</b>	Regional meta-framework	National qualifications framework
<b>Geographical Scope</b>	European Union	Australia
<b>Range of systems covered</b>	Comprehensive – lifelong learning	Comprehensive - all qualifications
<b>Origins and development</b>	Derived from EU policy on lifelong learning	Second generation framework, building on existing AQF
<b>Governance</b>	EQF Advisory Group European Commission (DG EAC)	AQF Council is the responsible and representative body for AQF <sup>30</sup>
<b>Framework architecture</b>	Learning outcomes described in terms of knowledge, skills and competence	Learning outcomes described in terms of knowledge, skills and the application of knowledge and skills
	Level descriptors defined on the basis of learning outcomes	Levels summaries and criteria defined on the basis of learning outcomes
	8 levels	10 levels
	No qualification types defined	Descriptors for 15 qualification types, developing the levels criteria in more detail
<b>Use of volume indicators or credit</b>	No definitions of credit or volume in the EQF. Two European credit systems are being implemented: ECTS and ECVET, but EQF does not require the use of credit.	Volume of learning defined for each qualification type
<b>Quality assurance</b>	EQF referencing criteria require national systems to show that their QA arrangements are consistent with the relevant European principles and guidelines.	Quality assurance is an integral component of the Australian education and training system, and all AQF qualifications are quality-assured; different arrangements apply for general education, VET and HE.

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## 2.4 The ‘external’ dimension of qualifications frameworks

### 2.4.1 European meta-frameworks

The EQF Recommendation (which is the soft legislation that defines the EQF at European level) does not refer to the external dimension of the EQF with regard to countries outside Europe. The main goals of EQF, as stated in the Recommendation, are related to facilitating mobility within the EU and supporting lifelong learning. However, the external dimension of the EQF already exists. Countries outside the EU are increasingly considering EQF as a model for the design of their national qualifications frameworks<sup>31</sup> and the interest of countries outside the EU in the EQF has already been expressed during several international events

<sup>30</sup> The Australian Government takes the lead on matters of international engagement and, as such, DEEWR is the lead organisation in any work on international comparison of qualifications, with the AQFC providing technical advice.

<sup>31</sup> ETF (2011)

which focused on this topic<sup>32</sup>. EQF is a theme frequently discussed in the policy dialogues between the European Commission and countries outside the EU (an example being the EU-Australian policy dialogue). Furthermore, the European Training Foundation supports the development of qualifications frameworks<sup>33</sup> in countries that fall under its mandate (accession countries, neighbouring countries but also countries in Central Asia).

The external dimension of the FQ EHEA is much more clearly defined. The FQ EHEA is embedded in the Bologna process which has as one of its main objectives to improve the international attractiveness of European higher education. The FQ EHEA framework also covers all countries participating in the Bologna process (47 countries). In the Leuven and Louvain la Neuve Communiqué (2009), the ministers in charge of higher education taking part in the Bologna process declared:

*We call upon European higher education institutions to further internationalise their activities and to engage in global collaboration for sustainable development. The attractiveness and openness of European higher education will be highlighted by joint European actions....*

Though this statement does not explicitly refer to the use of qualifications frameworks in this process, the QFs are clearly seen as one of the pillars to support the international recognition of qualifications<sup>34</sup>.

The 2010 independent assessment of the Bologna process<sup>35</sup> included an evaluation of the contribution of the Bologna process to the attractiveness of European higher education in a global perspective. The assessment is rather cautious with regard to this point since outside the Bologna countries, the Bologna process remains for the moment only known to experts. Nevertheless the report notes that:

- The Bologna process has contributed to improving the admission of European graduates with bachelor degrees, which last three years, to postgraduate studies in US universities where normally a four years degree is required<sup>36</sup>;
- Countries (outside Europe) are considering the compatibility of their qualifications and qualifications system structures when designing higher education reforms<sup>37</sup>.

Though these developments are not explicitly attributed to the QF EHEA, it can be assumed that the use of the three cycle structures is related to both developments observed.

It can be expected that the EQF may have some similar effects on countries outside Europe. As said above, it is already the case that when neighbouring countries are developing their qualifications frameworks, they take into consideration the EQF structure and principles (this is for example the case in Russia or Tunisia)<sup>38</sup>.

The European meta-frameworks are already having an influence on the qualifications systems and frameworks developments outside Europe without actually having in practice implemented actions in favour of such developments. The question that for the moment remains unanswered and to which this study is expected to contribute, is whether there should and could be (in terms of feasibility) a pro-active process with regard to such

<sup>32</sup> 29-30 January 2009 Conference entitled EQF Linking to the globalised world [http://ec.europa.eu/education/news/news1160\\_en.htm](http://ec.europa.eu/education/news/news1160_en.htm) ; 13-14 December 2010, Peer learning event, National Qualifications Frameworks: an international perspective [http://ec.europa.eu/education/eu-australia/doc2786\\_en.htm](http://ec.europa.eu/education/eu-australia/doc2786_en.htm)

<sup>33</sup> Castejon Jean-Marc, Chakroun Borhène, Coles Mike, Deij Arjen and McBride Vincent (2011)

<sup>34</sup> See for example the section *National frameworks of qualifications and recognition and transparency instruments* in the Background paper for the QF EHEA. Bologna Working Group on Qualifications Frameworks (2005)

<sup>35</sup> CHEPS (2010)

<sup>36</sup> IIE (2009) and AACRAO (2007): American Association of Collegiate Registrars and Admissions Officers. Both cited in CHEPS (2010)

<sup>37</sup> CHEPS (2010)

<sup>38</sup> See for example Allias (2010)

developments. The two meta-frameworks in Europe are 'owned' by the countries that actually implement them. The supra-national organisations (i.e. the European Commission for the EQF and the Council of Europe for the FQ EHEA) have the role of mediators between the countries. They also have a role in monitoring the implementation and safeguarding the quality of these instruments. There is for the moment no process through which a relationship between the European meta-frameworks and another qualifications framework (be it a national or a regional construct) could be developed. This is one of the aspects that will be discussed as part of this study (see Section 8).

#### 2.4.2 The AQF and international affairs

Given that Australia is a federal country, the Australian Government takes the lead on matters of international engagement and, as such, the Department of Education, Employment and Workplace Relations (DEEWR) is the lead organisation in any work on the international comparison of qualifications, with the AQFC providing technical advice.

The AQF is well known and respected in the Asia-Pacific region. Several other countries in the region are currently engaged in developing frameworks and are availing of advice and technical support from Australia.

##### 2.4.2.1 Existing comparisons or alignments

Until recently, no formal mapping processes had been undertaken to make direct comparisons between Australian and international qualifications. However, in 2009, the Ireland – Australia Qualifications Project was initiated, to explore the possibility of a formal alignment of the Irish National Framework of Qualifications (NFQ) with the Australian Qualifications Framework (AQF). The project was a joint initiative of the Australian Department of Education, Employment and Workplace Relations (DEEWR) and the National Qualifications Authority of Ireland (NQAI – an agency of the Irish Department of Education and Science). The project set out to map and compare a range of aspects of the Irish and Australian Qualifications Frameworks. The results of the comparison<sup>39</sup> indicate that the two frameworks, while by no means identical, share many core concepts and design features, suggesting that an alignment between the two frameworks is feasible.

Apart from structural alignments, the AQF is used extensively by AEI-NOOSR (Australian Education International – National Office of Overseas Skills Recognition), professional associations and other agencies when assessing overseas qualifications, largely for the purpose of comparing an individual's overseas qualifications for work or migration to Australia. A considerable body of case-study data has been gathered by AEI-NOOSR, and many one-to-one relationships between Australian and international qualifications have been identified. This use of the AQF is further discussed in this study.

## 2.5 Policy dialogue between EU and Australia

The above description shows that qualifications frameworks are rather important elements of European as well as Australian education and training policies nationally and internationally. That is the reason why work on this topic has been selected as one of the main themes for the Australian-EU policy dialogue in education and training policies. The joint declaration between EU and Australia signed in 2007 constitutes the basis for the bilateral cooperation within the field of education and training<sup>40</sup>.

Policy dialogue is an instrument for bilateral exchanges between the European Commission and key countries outside the EU. Themes of common interest to the partner country as well as the European Commission are selected and discussed. The policy dialogue takes place through high level meetings and is supported by research and analysis, such as this joint study. It is an opportunity to exchange experience and good practice but potentially also a basis for taking joint decisions and actions.

<sup>39</sup> NQAI and DEEWR (2010)

<sup>40</sup> European Commission DG Education and training web-site on EU-Australia policy dialogue [http://ec.europa.eu/education/eu-australia/doc1579\\_en.htm](http://ec.europa.eu/education/eu-australia/doc1579_en.htm)

### 3 Study approach

One of the goals of this study was to gather existing evidence on the role of qualifications frameworks in supporting the mobility of students and workers, but also to extrapolate from the evidence about the actual trends in mobility and qualification recognition. Another goal was to analyse the view of stakeholders on the added value and limitations of qualifications frameworks in this process. In this context, also their perceptions about the added value (and limitations) of international qualifications frameworks' linkages and in particular, the role of EQF, were analysed.

To meet these objectives this study was designed as an exploratory, non-comprehensive qualitative review. The study also has a speculative element to it which was desired and necessary. Given the scarcity of existing evidence on certain issues tackled in this document, it was necessary to extrapolate and to formulate tentative judgements. The study also has a forward looking element which concerns the possibilities of linking the EQF and the AQF.

This section presents:

- The approach followed;
- The scope of the study; and
- The methodology used.

#### 3.1 Approach followed

As mentioned earlier, the goal of the study is to **explore** the role of qualifications frameworks in supporting the mobility of students and workers through a qualitative, exploratory and forward-looking approach. This sub-section presents the way the study theme was approached in this analysis, including the understanding of the main terms used.

Qualifications frameworks have different characteristics depending on the qualifications system in which they are implemented<sup>41</sup>. In general, they are characterised by:

- The existence of a categorisation of qualifications, which is in most cases expressed in terms of levels, though other means can be used. For example, until recently, the Australian Qualifications Framework was not based on levels but on qualifications types;
- An explicit mechanism based on criteria which have a quality assurance role through which qualifications are categorised (i.e. included in the framework and assigned a level in most cases);
- The existence of a register (or registers) of qualifications which underpin the framework.

The qualifications frameworks being developed in Europe as well as the Australian Qualifications Framework have, as a core feature, the use of learning outcomes to define and describe qualifications.

NQFs can have different objectives depending on the issues these instruments are expected to address,<sup>42</sup> but fundamentally their role is to categorise qualifications according to certain criteria and therefore structure the qualifications system and make it more transparent. This transparency can be used within the qualifications system or outside (i.e. internationally). Hence, the role of qualifications frameworks can be seen from two perspectives:

- Their role within the national qualifications system (internal); or
- Their external dimension which concerns the interaction between the national qualifications system and other qualifications systems.

<sup>41</sup> Discussions about the different roles and uses of qualifications frameworks can be found in the following studies and documents CEDEFOP (2010 b); OECD (2005 a). Bjornavold Jens and Coles Mike (2010)

<sup>42</sup> There is a large body of literature discussing the possible objectives of NQFs, for example Bjornavold Jens and Coles Mike (2010)

The internal role(s) of qualifications frameworks have already been analysed in several studies that show their potential benefits for aspects of education and training policies such as<sup>43</sup>:

- Improved progression of learners;
- Enhanced possibilities for recognition of non-formal and informal learning;
- More transparent governance of qualifications and qualifications structures;
- Quality assurance; or
- Improved orientation and guidance.

The improved transparency of qualifications structures and qualifications content is also expected to support the mobility of individuals<sup>44</sup>. In other words, it is anticipated that qualifications frameworks will improve the recognition of qualifications abroad: be it formal recognition by public authorities or education and training institutions or informal recognition by employers (see below). It is expected that the improved transparency of qualifications frameworks through NQFs will support countries' external policies such as attracting international students or recognising foreign workers' qualifications. All qualifications frameworks within Europe will have a clear external dimension as they will all progressively become referenced to the European Qualifications Framework. By being linked to the EQF, the qualifications systems can be more easily compared. The external dimension of the Australian Qualifications Framework has already been outlined above.

In most EU countries, qualifications frameworks are a new or developing aspect of qualifications systems. In Australia on the other hand, a qualifications framework has been in place for several decades now. In several European countries, it is therefore too early to analyse the existing role of qualifications frameworks in facilitating mobility as these structures do not yet exist and their role in mobility policies has not yet been clearly defined in many countries. In Australia on the other hand, the external dimension of the AQF and its use for qualification recognition in the context of mobility, can already be studied as certain experience exists.

Given these limitations in existing practice and hence data, the decision has been made in this study to look at broader sources of information and to extrapolate from them. This study therefore has a non-negligible speculative dimension and it was preferred to modify the initial title by including the word 'potential' (i.e. to use potential role of qualifications frameworks to support mobility), so as to indicate the prospective element.

The following approach combining existing information and collecting new data has been used:

- Firstly, existing information about the mobility trends of students and workers was examined with a view to identify the characteristics of mobility trends which favour the use of qualifications frameworks in this context;
- Secondly, policies and policy frameworks to support the mobility of both workers and students were analysed to identify the role qualifications and qualifications frameworks are assigned in these contexts;
- Thirdly, desk research and literature review summarised the existing approaches for qualification recognition, also looking at a selection of professions.
- Finally, the views of a small number of experts were gathered.

Consequently, two types of information were collected:

- Data directly concerning the use of qualifications frameworks; and

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<sup>43</sup> CEDEFOP (2010 b)

<sup>44</sup> Bjornavold Jens and Coles Mike (2010)

- Data which concerns qualification recognition and mobility as such (not directly related to qualifications frameworks).

While the first type of data could be directly analysed to address the main study questions, the second type of data was used to gather indications and trends which help understand the potential of qualifications frameworks in the context of mobility.

### 3.2 Scope of the study

In order to translate the study objectives and the above described approach into a feasible research framework, it was necessary to delimitate the scope of the analysis.

When it comes to the **geographical scope**, it was not possible to cover all EU countries in this assignment and hence a group of eight countries was selected where information on the research issues was systematically gathered. These countries are: Germany, Greece, Italy, Ireland, the Netherlands, Malta, Poland and United Kingdom. Australia was the ninth country studied.

The EU countries were selected because:

- They had relatively high mobility rates with Australia;
- They represent a variety of patterns in terms of qualifications frameworks development;
- They represent a variety of patterns in terms of mobility flows; and
- They cover different geographical dimensions of Europe, as well as small and large countries and they cover a variety of education and training (and hence qualification) traditions.

These dimensions are represented in the sample in the following manner:

- Countries with established qualifications frameworks (UK, IE, MT) and countries that are developing qualifications frameworks (EL, DE, IT, NL, PL). The latter are also at different stages of development;
- Large countries (DE, UK, IT, PL), medium sized countries (NL, EL) and smaller countries (IE, MT);
- The different geographical dimensions: west (NL, UK, DE, IE), east (PL), and south (EL, MT, IT), even though the Nordic dimension is missing from this sample;
- Countries that have experienced important emigration (IE, IT, EL, MT, PL) as well those that are traditionally immigration countries (DE, UK, NL): even though most of the EU countries that have known significant emigration are also destination countries for migrants from other parts of Europe or the world;
- Centralised and formalised education systems with strong importance of formal qualifications in education and training systems and partly labour markets (PL, EL), countries with strong importance of VET systems and qualifications including at higher levels (DE, NL), country with decentralised aspects of the qualifications system at the regional level (IT), countries with a strong qualifications authority in place centralising the quality assurance policy on qualifications (IE, MT), country with a complex qualifications system and a liberal approach to the role of qualifications in the labour market (UK).

Furthermore, these countries are the eight most frequent countries of origin of European migrants in Australia<sup>45</sup>.

In terms of the delimitation of the term **mobility**, for students' mobility, the study looked predominantly at 'degree mobility' in a transnational context. However, where relevant issues were identified through desk research regarding other forms of mobility (credit mobility or

<sup>45</sup> Total UK Population in Australia is 1.007million, Italy: 217,664; Greece: 115,258; Germany: 105,517; the Netherlands: 82,270; Poland: 57,083; Ireland: 49,042; Malta: 46,700. Source: Extended Bilateral Migration Database, 2000 - Joint OECD - World Bank

short-term mobility such as language courses), these were included. Degree mobility designates situations where students study the whole education programme in an institution that is in a different country than the one where they obtained their initial/entry qualification. Credit mobility designates situations where a student undertakes part of the study programme abroad<sup>46</sup>.

In terms of workers' mobility, the study looked at those forms of mobility that require formal or informal recognition of qualifications. This concerns in particular, mobility related to long term employment in a foreign country. In Europe, particular attention was paid to gather information about the mobility of nationals from countries outside the European Economic Area (EEA), as the mobility within the EEA is supported by a range of rules and regulations. However, issues related to intra-EEA mobility that came out of literature and interviews were included in the analysis.

Only cross-border mobility was analysed, while other forms of mobility such as inter-regional mobility, professional mobility (changing careers or employment positions) or social mobility, were not covered by this analysis.

The study frequently uses the term qualification recognition. This may have several meanings:

- Formal recognition of a foreign qualification by a competent national authority as equivalent to the qualification of the host country (country where the applicant seeks recognition). This can be for the purpose of labour market insertion (regulated professions) or for academic purposes;
- Recognition in terms of giving access to further studies (depending on the country practice, this does not necessarily require a formal process of identifying equivalence with an existing qualification in the host country where the person seeks recognition);
- Informal recognition by the labour market and by employers (the capacity to access a position that is in line with one's qualification).

Where possible, the research team tried to distinguish between these forms of recognition, but due to the limitations in data availability this was not always possible.

### 3.3 Methodology

The methodology followed was based mainly on two types of data:

- Secondary data gathered through desk research and literature review; and
- Primary data gathered through expert interviews.

The study followed a two phase approach. In the first stage, based on desk research, researchers speaking the languages of the countries analysed completed a country fiche which covered the following types of information about the country:

- Basic information about the mobility patterns in a given country concerning both students and workers (according to availability: numbers, countries of origin and destination; fields of study or economic sector);
- Policy frameworks for student mobility:
  - Key aspects of the internationalisation strategy and in particular, the role of qualifications in this context;
  - Review of bilateral agreements on recognition of qualifications;
- Policy frameworks for workers' mobility (outside EU):
  - An overall framework for migration policy with regard to highly skilled or skilled workers;
  - The role of qualifications in these arrangements;
- The role of qualifications frameworks in the policy frameworks above;

<sup>46</sup> See for example Kelo Maria, Teichler Ulrich and Wachter Bernd (2006)

- Information on mobility and qualification recognition in certain key sectors such as health care, IT, and engineering.

The country fiches were working documents and are not presented in this study as such. However, information from these fiches is used in this report.

To complete the fiches the researchers were asked to review:

- Web-sites of ministries and organisations in charge of student mobility:
  - Policy documents;
  - Information for prospective applicants;
  - Reports or studies on the topic;
- Web-sites of ministries and organisations in charge of migration policy:
  - Policy documents;
  - Information for prospective applicants;
  - Reports or studies on the topic;
- Web-sites of ENIC/NARICs;
- Academic literature on the topic.

The list of sources reviewed is presented in the Annex 3.

In the second stage of the study, expert interviews were carried out. These interviews were semi structured and they were conducted over the phone. The interviewees were selected because of their expert knowledge of any of the following:

- Student mobility policies and practices or policies and practices related to workers' mobility (beyond the EU);
- Qualification recognition;
- Qualifications frameworks.

In total 22 interviews were carried out (see Table 3.1 for list of organisations interviewed), of which 18 were in the selected EU countries and 4 were in Australia. In the EU countries, more than 30 organisations were initially contacted (see list in Annex Four), but several did not consider their organisation, though corresponding to one of the above categories, was competent to respond to questions related to the main theme of the study. In general, researchers were redirected to the ENIC/NARIC centres.

The breadth of information provided varied from one interviewee to another due to differences in the involvement of interviewed organisations in the issues of mobility and qualifications frameworks. Interviewees were questioned about the topics listed in Table 3.2 (the full interview topic guide can be found in Annex Five), but not all interviewees were able to respond to all questions. The interviews lasted between half an hour and one hour.

Table 3.1 Organisations interviewed

Country	Organisation	Country	Organisation
DE	Central Office for Foreign Education in the Secretariat of the Standing Conference of the Ministers of Education and Cultural Affairs (also a Bologna expert)	NL (BE nl)	Accreditation Organisation of the Netherlands and Flanders
DE	Tuerantuer Foundation (research on mobility of workers and qualification recognition in Germany)	NL	NUFFIC (Netherlands organisation for higher education cooperation as well as the ENIC/NARIC centre)
EL	IKY – State Scholarships Foundation	NL	COLO – Association of 17 Dutch National Centres of Expertise on Vocational Education, Training and the Labour Market
EL	National Academic Recognition Centre (D.O.A.T.A.P)	PL	Bureau for academic recognition and international exchange - National Co-ordination Point for National Qualifications Frameworks
IE	Economic and Social Research Institute (research on mobility aspects)	PL	Ministry of Science and Higher Education
IE	National Qualifications Authority of Ireland (ENIC/NARIC centre)	PL	Institute for Educational Research in Warsaw (runs a major project on NQF development)
IE	Integration centre Ireland	UK	Scottish Credit and Qualifications Framework Partnership
IT	ENIC/NARIC centre	UK	British Council (also Bologna expert)
MT	Malta Qualifications Council	UK	ENIC/NARIC
<b>Interviews in Australia</b>			
AUS	National Office of Overseas Skills Recognition (ENIC/NARIC)	AUS	Australia Qualifications Framework Council
AUS	Australian Education International (DEEWR)	AUS	Australian Industry Group

As said earlier, the amount of information gained through interviews varied from one interviewee to another. An overall appreciation of the level of information provided according to the interview topics can be made (see Table 3.2). In general, EU interviewees' responses were most informative with regard to the role, use and recognition of qualifications for students' mobility and the characteristics of qualifications which matter most for recognition procedures currently in place. Relatively little information was collected through EU interviews about issues related to specific sectors and the recognition of qualifications of workers. In this context, many EU interviewees were inclined to talk about the recognition of qualifications for regulated professions as governed by the Directive 2005/36/EC<sup>47</sup>. Information about mobility with countries outside the EU and recognition in this context was somewhat scarce. This is also related to the fact that, as will be discussed later in the text, there is rather little experience in the EU in the systematic formal recognition of qualifications for workers' mobility from countries outside the EU. Workers' qualification recognition is, in most cases, left for the employer to decide and it was not possible in the context of this analysis to interview sufficient number of employers' representatives or sectoral organisations.

<sup>47</sup> This directive defines a process through which EU nationals holding a qualification and/or relevant professional experience of a defined duration from one Member States are entitled to seek recognition in another EU Member State where the formal qualification recognition is required to practice a given profession (regulated profession). For more information see the web-site of the European Commission on this topic: [http://ec.europa.eu/internal\\_market/qualifications/index\\_en.htm](http://ec.europa.eu/internal_market/qualifications/index_en.htm)

The situation is different when it comes to the Australian interviews. Due to a long term policy and systematic approach, the organisations interviewed had much more experience in qualification recognition for mobile workers.

Table 3.2 List of interview topics and an overall appreciation of the volume of information collected through the interviews according to topics

Main theme	Explanation	Volume of information collected through the	
		EU interviews	Australian interviews
Current role of qualifications in supporting mobility of students	What works well with qualification recognition of mobile students/ graduates. The role of qualifications frameworks in internationalisation strategies of education systems.	Rather high	Rather high
Existing obstacles in recognition of qualifications in the context of student mobility	What issues exist in qualification recognition. What are these problems due to.	Rather high	Rather high
Current role of qualifications in supporting mobility of workers	The role of qualification recognition in migration policy. Link with qualifications framework levels. The policies for attracting highly qualified staff and how these are linked to qualification recognition. The policies to attract staff in specific professions and the role of qualifications in the process.	Medium to low	Rather high
Existing obstacles in recognition of qualifications in the context of workers' mobility	Appreciation of the qualifications recognition process. Discussion of existing issues.	Medium to low	Rather high
Relevance of particular qualifications characteristics	What features of qualifications are of particular importance for recognition.	Rather high	Medium
Qualifications versus professions	Existence of recognition arrangements in certain specific professions.	Rather low	Rather low
The (possible) added value of qualifications frameworks regarding the mobility of learners and workers	Opinion about the (potential) added value of qualifications frameworks in supporting mobility of students and workers. The possible role of international referencing of qualifications frameworks and that of the EQF.	Medium	Medium to low
The limitations of qualifications frameworks	Opinion about the (potential) limitations of qualifications frameworks in supporting mobility of students and workers. The possible limitations of the role of international referencing of qualifications frameworks and that of the EQF.	Medium	Rather high

Information gathered through interviews was analysed manually using text analysis. The information provided and the views expressed are presented in the form of tables and citations in this report.

## 4 Mobility trends in the selected countries

In order to understand the potential role of qualifications frameworks in the context of the mobility of students and workers, it is important to summarise certain key trends in mobility of learners and workers which have implications on qualification recognition. These key trends will be discussed in this section. The information presented here is meant to give a global overview of how and why students' and workers' mobility trends are related to qualifications and consequently qualifications recognition. The section does not attempt to give a comprehensive picture of students' and workers' mobility flows. To keep the information concise and to focus on the core of this study, as often as possible the choice has been made to present the underpinning evidence on mobility trends (tables and charts) in the Annex 1 of this report.

### 4.1 Relevant trends in mobility of students

#### 4.1.1 Growing students' degree mobility increases demand for qualification recognition

According to the UNESCO (2009) Global Education Digest<sup>48</sup>, the total number of higher education students who study outside their country of origin grew by 53% between 1999 and 2007 (annual growth between 2006 and 2007 was 4.6%). According to this data, worldwide, there were 2.8 million students in tertiary education enrolled outside of the country of their origin, which represents nearly 2% of the overall population of tertiary education students<sup>49</sup>.

While this figure only gives an approximate picture of student mobility, it shows that the numbers of higher education students concerned today are significant. The difficulties of estimating real student mobility are linked to these two reasons:

- In most cases countries' collected data only covers degree mobility; and
- Many countries define a mobile student according to his or her nationality instead of the country where previous studies took place or country of permanent residence.

This means that short duration mobility is not captured in international datasets on students' mobility and that students of foreign origins who are long established in a given country (e.g. because of migration of their parents) are often counted as mobile students.

At a global level, little is known about the scale of the mobility of students in other sectors of education and training than in tertiary education<sup>50</sup>. But mobility also exists at secondary level as well as in the non-tertiary vocational education and training systems. While it probably mostly concerns organised exchanges of relatively short duration or other types of learning, such as language courses mobility of longer duration, also exists (organised mobility or mobility related to the mobility of children's' parents). In Australia for example, there is a rather high proportion of foreign students in vocational education and training (see below)<sup>51</sup>.

Certain countries analysed in this study can be categorised as predominantly hosting countries while others are mainly sending countries (see Table 4.1):

- Germany, United Kingdom, and Australia receive large numbers of foreign students (in total numbers as well as compared to their overall tertiary student population);
- Ireland, Greece and Malta send out a significant proportion of their students – Greece is the OECD country which has the highest number of students studying abroad per capita of all OECD countries<sup>52</sup>;

<sup>48</sup> UNECSO (2009), p.36

<sup>49</sup> According to the same dataset the number of tertiary education students in the world was 152.5million in 2007 meaning that the proportion of students studying in countries other than their country of origin was 1.84%.

<sup>50</sup> Note that depending on the system, post-secondary VET is sometimes included as tertiary education and sometimes as non-tertiary education.

<sup>51</sup> though it should be noted that the way this number is shared between tertiary and non-tertiary VET is not clear

<sup>52</sup> Kathimerini (2/12/2006)

- The Netherlands has rapidly growing incoming mobility, but this has not yet reached levels comparable to Germany, United Kingdom or Australia;
- Italy and Poland have relatively low levels of both incoming and outgoing student mobility.

Of the countries studied, Australia is by far the country which hosts the most foreign students compared to the total home student population. In 2009, internationally mobile students accounted for 28.3% of total higher education students<sup>53</sup>.

It is interesting to note that, based on 2006 data, in all the countries studied, the numbers of foreign incoming students are growing<sup>54</sup>.

The issue of qualification recognition is important for those receiving students with foreign qualifications as well as for those countries or organisations sending students to study abroad. Countries and institutions that want to be an attractive destination need to ensure that they have clear, transparent and relatively simple processes to ensure that foreign students are enrolled into education programmes at the appropriate level. Those who send out students are interested in making sure that their qualifications are appropriately recognised:

- When they arrive to the foreign country (systematic lack of such recognition can be perceived as a negative perception of the education the country provides to its citizens/institution and to its students);
- When they return with their foreign qualification and wish to either pursue studies or enter employment in the country of origin.

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<sup>53</sup> Department of Education, Employment and Workplace Relations (2011)

<sup>54</sup> Note: more recently some countries have seen a slight decline in numbers of foreign students following the introduction (or increase) of fees for foreign students. See for example the discussion on the role of fees in student mobility between EU and China in GHK (2011)

Table 4.1 Tertiary education students of a country nationality abroad as percentage of students in the country (outgoing) and foreign students as percentage of total students (incoming)

	Prevailing trend	Outgoing mobility			Incoming mobility		
		2006	2003	2000	2006	2003	2000
<b>Germany</b>	Mainly a country with <b>incoming</b> student mobility. Incoming and outgoing mobility is <b>growing</b> .	3.1	2.1	1.7	12.8	11.9	10
<b>Ireland</b>	Mainly a country with <b>outgoing</b> mobility. This form of mobility keeps <b>growing</b> .	16.9	10.1	13	8.8.*	n/a	n/a
<b>Greece</b>	A country where <b>outgoing</b> mobility prevails but <b>decreases</b> . Incoming mobility on the other hand, increases.	8.5	10	19.6	3.6	2.5	:
<b>Italy</b>	Incoming mobility is slightly higher than outgoing, but overall the two are <b>balanced</b> . Incoming mobility is growing. Overall mobility is <b>low</b> compared to other countries in the sample.	1.3	1.6	1.1	2.4	1.8	1.4
<b>Malta</b>	Country with higher <b>outgoing</b> mobility, where both incoming and outgoing mobility are <b>growing</b> .	11	6.8	9.6	7.7	5.6	5.6
<b>The Netherlands</b>	<b>Incoming</b> mobility is higher and <b>increasing</b> while outgoing mobility is stable.	1.6	1.5	1.6	6.5	3.9	2.9
<b>Poland</b>	Country where <b>outgoing</b> mobility is somewhat higher than incoming mobility and keeps on growing. Overall mobility is <b>low</b> compared to other countries in the sample.	1.4	1	0.8	0.5	0.4	0.4
<b>United Kingdom</b>	<b>Incoming</b> mobility largely prevails over outgoing mobility. Incoming mobility is <b>growing</b> .	0.4	0.5	0.6	18.3	14.1	13.4
<b>Australia</b>	<b>Incoming</b> mobility largely prevails over outgoing mobility. Incoming mobility is <b>growing</b> .	0.5	0.3	0.3	20.2**	18.7	12.5

Source: Eurostat. Indicators: Foreign students as % of total students, by origin and sex (ISCED 5A-6) (educ\_bo\_mo\_el8i)<sup>55</sup> and Students abroad (ISCED 5A-6) as % of students in country of origin, by sex (educ\_bo\_mo\_el8o).

\*2007 data from UNESCO (2009) *Global education digest 2009* \*\*2005 Data

While there is no comprehensive information worldwide about the labour market pathways of students who have studied abroad, it is reasonable to assume that a non-negligible share of them return to their home country or move to another country. While reports suggest that the possibilities of gaining residence permits are an important factor of choice for enrolling in higher education institutions abroad<sup>56</sup>, not all foreign graduates can and decide to stay<sup>57</sup>. Many European countries wish to expand the international provision of their higher education institutions without necessarily wishing for these graduates to stay. Furthermore, even if

<sup>55</sup> It was preferred to use this indicator rather than the indicator *Graduates (ISCED 5A-6) from abroad (foreigners/mobile students), by sex - % (educ\_bo\_mo\_gr4)* regarding which information is available only in few countries as of May 2011.

<sup>56</sup> See for example Verbik et al (2007)

<sup>57</sup> For example:

In 2006, 134,000 Chinese students studied abroad, while 42,000 returned to China. Source: GHK (2011) *EU-China Student and Academic Staff Mobility: Present Situation and Future Developments*, p. 40

The data from University of London prepared for the *Destinations of Leavers from Higher Education survey* shows that nearly 37% of foreign graduates are in another country than the UK (where they obtained their degrees) six months after graduation. The vast majority of them (27%) return to their home countries. The proportion of students who return or go to yet another country is even higher when looking at data concerning only post-graduate students (44% do not stay in the UK of which 36.41% return to their home country). The data from the University of London as well as explications can be found here: <http://www.careers.lon.ac.uk/international/Stats.aspx>

mobile students do not return directly after graduation, they may decide to (or need to) return after several years of working experience. It is in the interest of the individuals themselves, the receiving country (to optimise the use of human resources) as well as the degree awarding institution (to maintain its attractiveness as an international destination), to make sure that their qualifications are recognised.

Growing student mobility is also likely to lead to growth in workers' mobility. People who have been mobile as students are more likely to be mobile when they enter the labour market. An empirical study of data on German graduates showed that studying abroad (even for a shorter period of studies) significantly increases an individual's probability of working abroad later in life<sup>58</sup>.

#### 4.1.1.1 *Implications for the role of qualifications frameworks*

Growing transnational mobility of students implies that:

- There is greater demand for the recognition of qualifications of incoming students who wish to pursue their studies in a foreign country;
- Given that a share of international students return to their home countries or work in a yet another country, there is an increasing demand for the recognition of graduates' foreign qualifications when they enter into the labour market; and
- Provided that spending a period of studies abroad (credit mobility) increases the probability of working abroad later in life, there is also likely to be an increased demand for (formal or informal) recognition of qualifications for labour market mobility.

The increasing demand for qualification recognition brought in by growing student mobility necessitates that a variety of institutions and organisations have in place mechanisms that support qualification recognition. These institutions/organisations are:

- Education and training bodies receiving foreign students;
- Where applicable, national authorities that regulate student admission procedures;
- Organisations in charge of the formal qualification recognition of returning overseas qualified persons;
- Employers recruiting overseas qualified persons.

As will be discussed later in this study, qualifications frameworks are an instrument that has a role to play in the recognition process.

#### 4.1.2 *The countries of origin of mobile students are diverse*

Mobile students come from very different countries and regions. While linguistic and cultural proximity are a factor of choice, a lot of student mobility takes place between countries that are not geographically, historically or culturally connected. For example:

- Chinese students (who represent the largest numbers of mobile students) frequently go to English speaking countries (USA, UK, Australia), but also to Germany;
- Germany receives significant numbers of students from the Russian Federation, Middle-East countries, as well as Maghreb countries, but it also receives a number of students from Central and Eastern Europe;
- Greek students abroad go predominantly to the United Kingdom;
- The United Kingdom receives students from all across the world, but largest numbers come from China, Europe, Commonwealth countries and past colonies;
- Australia receives students from China, India, South-East Asia and Oceania, but also from certain African and Middle-East countries.

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<sup>58</sup> Parey Matthias and Waldinger Fabian (2007)

Table A-1 in Annex 1 gives an idea of the diversity of mobile students' flows. It shows where the mobile students from the countries studied here most frequently go to. It also gives an idea of the countries of origin of foreign students in the selected countries<sup>59</sup>.

Qualification recognition can be tackled relatively easily, if those in charge of recognition (be it formal or informal recognition) have a good understanding of and trust in the qualifications system/structures in the country where the qualification was awarded. However, when the flows of students and graduates are very diversified there is a need for more structured tools to support fair recognition. As noted by d'Artillac Brill in her study of recognition process for regulated professions in the Netherlands<sup>60</sup>:

*Where there is prior experience with foreign diplomas, recognition is no problem. But where diplomas are unfamiliar, and have to be studied for essential differences, then the recognition procedure can sometimes be difficult.*

When talking about the recognition of foreign qualifications for access to an education and training programme abroad, the international principles applied expect that recognition is based on whether an applicants' qualification entitles him or her to enter a programme at an equivalent level in his/her own country<sup>61</sup>. In other situations (for example for certain regulated professions) there is a need for recognition based on the equivalence between the qualification of the awarding institution and that in the host country<sup>62</sup>. Independent of whether the recognition is based on equivalence or achieved 'rights' if the countries of origin of mobile persons are diverse, it is impossible to only rely on the fact that each institution in charge of recognition will become familiar with such a broad range of foreign qualifications through its own experience. It is important to have structures in place that enable the exchange of information between those who are to recognise the foreign qualification and those who can provide reliable and valid information on this point. Such structures are also important for formal qualification recognition in view of entering the labour market.

This was among the reasons for setting up the network of ENIC/NARIC centres. This network of national information centres on academic recognition provides qualified advice on the recognition of foreign qualifications<sup>63</sup>. Their advice concerns predominantly recognition for access to education and training, even though some centres are increasingly also playing a role in advising about recognition for labour market purposes. The centres were established to implement the Council of Europe/UNESCO policy on qualification recognition. Their role is to fill in the information gap about foreign qualifications; as will be seen later on, they work with a variety of tools, among which are qualifications frameworks.

#### 4.1.2.2 *Implications for the role of qualifications frameworks*

The fact that mobile students opt for many different destination countries implies that:

- The host countries are faced with recognition requests concerning prior qualifications from a broad range of countries with a diversity of qualifications and education and training systems; and
- When mobile students return to their home countries or are further mobile, the qualifications they hold and for which they will need recognition, will also be from a range of qualifications systems.

Recognising such diverse qualifications is difficult if based only on informal channels and tools and it is therefore necessary to put in place structured and clear procedures and tools. As will be discussed later in this study, because qualifications frameworks provide

<sup>59</sup> Note: the table is based on information of top five destination countries of mobile students according to country of origin. Therefore it does not give a complete view of who the foreign students in the studied countries are, it only shows the countries of origin for which the given studied country is among the top five destinations.

<sup>60</sup> D'Artillac Brill (2009) p13-23

<sup>61</sup> See for example West Anne and Barham Eleanor (2009) p25-37

<sup>62</sup> See for example D'Artillac Brill (2009) p13-23

<sup>63</sup> For a description of the role and history of the ENIC/NARIC networks see Bergan Sjur (2009) p39-53 and Rauhvargers Andrejs (2009) p111-125

information about the level and possibly also other information about qualifications, they have their place among the recognition instruments.

#### 4.1.3 Student mobility predominantly concerns tertiary education, but in some countries technical and vocational types and fields of studies attract significant numbers of international students

Worldwide, students' mobility concerns predominantly the highest end of education and training. According to the UNESCO institute of education<sup>64</sup>:

- Only 9% of mobile students enrol in occupationally oriented types of studies (while 34% of local students in host countries are enrolled in such studies);
- 44% of mobile students enrol in bachelor degree programmes;
- 40% enrol in master's degree programmes (compared to 7% of local students in host countries);
- 7% enrol in research programmes such as PhD (while only 3% of local students are enrolled in these types of programmes in host countries).

However, in some countries, there appears to be important interest of foreign students in non-academic (non-university) tertiary education, for example:

- In Germany, a quarter of foreign students study at Fachhochschule (university of applied sciences)<sup>65</sup>;
- In the Netherlands, students in this sector represent 54% of foreign students<sup>66</sup>;
- In Australia, 31% of international students in 2010 were taking courses leading to VET qualifications (at tertiary and non-tertiary level).<sup>67</sup>

These are mainly countries where vocational and technical education and training pathways constitute a strong component of tertiary education provision.

Information about the fields of study in which foreign students enrol is not systematically available across the sampled countries. Table A-2 in Annex 1 presents the data for Australia, Germany and the UK. It shows that there are notable differences across the countries:

- In Australia business and economy related studies are the choice of more than half of the foreign students;
- In academic higher education in Germany, humanities and arts are the predominant field of study (more than quarter of foreign students). Science studies are followed by business studies and engineering fields of study. In professional higher education engineering studies prevail followed by business and administration studies.
- In the UK, business and administration are the areas where most foreign students study (quarter of students), followed by social science, engineering and humanities and arts.

In Germany, a more detailed breakdown is available which shows that technical fields of study or fields of study that are directly linked with a specific profession, are highly popular among international students (see Annex 1). Similarly, in the Netherlands certain professionalising fields of study are rather popular with foreign students such as technology, agriculture and health care (see Figure A-2 in Annex 1).

When looking at which fields of studies the outgoing students from the selected countries opt for, the importance of technical and professional higher education fields of study is even stronger (see Figure A-3 in Annex 1):

- A number of Greek students go abroad to study engineering followed by natural sciences. Business and administration comes as third choice of study. This fact, combined with the high number of Greeks who decide to study abroad (but many of

<sup>64</sup> UNESCO institute for statistics (25/03/2010)

<sup>65</sup> DAAD (2010)

<sup>66</sup> Nuffic (2010)

<sup>67</sup> Australian Education International (2011 a)

whom return later on) and the fact that Greece has a rather strongly regulated labour market with high numbers of regulated professions,<sup>68</sup> means that most formal recognition procedures in Greece concern returning Greek citizens;

- Irish students most commonly choose to study abroad in the field of medicine and health care;
- German students abroad study mainly business, administration and economy followed by humanities and arts and social sciences.

#### 4.1.3.3 *Implications for the role of qualifications frameworks*

As said earlier in the text, mobile students are likely to continue being mobile when they complete their studies. They may return to their home country or move to yet another country. Therefore, the choices of types and fields of study of mobile students can possibly affect the demand for the recognition of qualifications, after the students have achieved their qualification, in the following manner:

- Many mobile students study in fields where it is likely that no formal recognition will be required if they continue being mobile, such as business, economy, humanities and arts or social sciences (excluding psychology). For most qualifications in these fields, the recognition is mainly done by the labour market (informal recognition). Furthermore, qualifications in these fields of study are in general broadly comparable worldwide;
- However, a great number of mobile students study in subject areas where qualifications are likely to have a regulatory function (engineering, health care) and may require formal recognition by national authorities if the students leave the country where the qualification has been awarded. This effect depends on the recognition methodology used in the receiving country: in Australia, the field of study is a minor consideration in the assessment of foreign qualifications.

Those education and training institutions that wish to attract mobile students to study areas which prepare for professions that are likely to be regulated, have an interest in making sure that the degrees they award broadly are recognised<sup>69</sup>. Also, students who chose to study in these disciplines are likely to make their choices based on whether the qualification will be recognised abroad or not. However, in these cases it is most commonly bilateral agreements, agreements with professional organisations or European legislation (such as the Directive 2005/36/EC) which ensure the recognition. It is not clear whether qualifications frameworks have a role to play in these processes.

The predominant part of students' degree mobility is in higher education (be it academic or non-academic). Due to the implementation of the three cycles qualifications structure through the Bologna process, European higher education qualifications have become much more comparable and, as confirmed by the interviews carried out for this study (see Section 6), rather well understood abroad. However, in certain countries many mobile students choose vocational types of studies which are in general less comparable worldwide and more difficult to interpret abroad (see Section 6 for a discussion of interview findings). Consequently, when students with these qualifications return to their home countries or move to another country, there is likely to be a need for tools to support fair qualification recognition. For those students who choose professional types of qualifications at the tertiary level which are considered to be equivalent to academic bachelor degrees when it comes to the possibilities for progression to further studies (such qualifications exist for example in the Netherlands or Germany), the use of qualifications frameworks and the fact that the two types of qualifications would be at the same level, could support their international recognition. For example, d'Artillac Brill<sup>70</sup> mentions that the international recognition of Dutch

<sup>68</sup> European Commission, DG Market, Database of Regulated Professions

<sup>69</sup> For example, several Polish medical universities have developed tuition provision in English and to recruit foreign students they emphasise that the qualifications they award are recognised. Example (extract from web-site study in Poland): *Degrees earned at the Medical University of Warsaw are recognized in the United States, Canada, European Union countries and most other countries of the world.*

[http://www.studyinpoland.pl/index.php?option=com\\_content&task=view&id=1&Itemid=52&uczelnia\\_id=88](http://www.studyinpoland.pl/index.php?option=com_content&task=view&id=1&Itemid=52&uczelnia_id=88)

<sup>70</sup> D'Artillac Brill (2009)

degrees from universities of applied sciences has improved when these qualifications and the academic bachelor degrees were both defined as first cycle degrees in line with the introduction of the Bologna three cycle system, which is linked to the qualifications framework development.

## 4.2 Mobility of workers

When discussing the mobility of workers, it is necessary to consider the trends in Australia separately from the trends in the other selected countries in this study. The situation for Australia is comparatively simple; it is a single, independent country with no land borders with any other country, and the only free movement arrangement in place is with New Zealand. The other eight countries covered in the study are all members of the European Union, within which workers are free to move without restriction. Thus, for the European countries involved, worker mobility is a complex weave of controlled immigration (from countries outside the EU) and free migration between Member States, including permanent migration, seasonal migration and even weekly or daily commuting across adjacent borders. In the EU, very little comparable data is available about workers' mobility which falls in categories other than permanent migration. Therefore, the section on EU mobility below mainly focuses on migration data.

## 4.3 Workers' mobility in the EU

### 4.3.1 EU experiences significant intra-EU and extra-EU mobility flows of people at age of employment

One source of information about the mobility of workers is migration data, even though this also covers information about the migration of family members, including children. In Europe (EU-27), migration has been growing over the past decade with a peak point in 2007. Since then, immigration figures declined, but continue being important. Between 2004 and 2008, immigration in the EU countries (including intra-EU mobility) concerned between three and four million people yearly<sup>71</sup>. Growing mobility in Europe has been recorded with regard to both<sup>72</sup>:

- EU – 27 citizens who have become more mobile (in 2007, 37% of immigrants in the EU were immigrants of another EU-27 country);
- Citizens from countries outside the EU (in 2008 they represented roughly half of immigration movement in the EU).

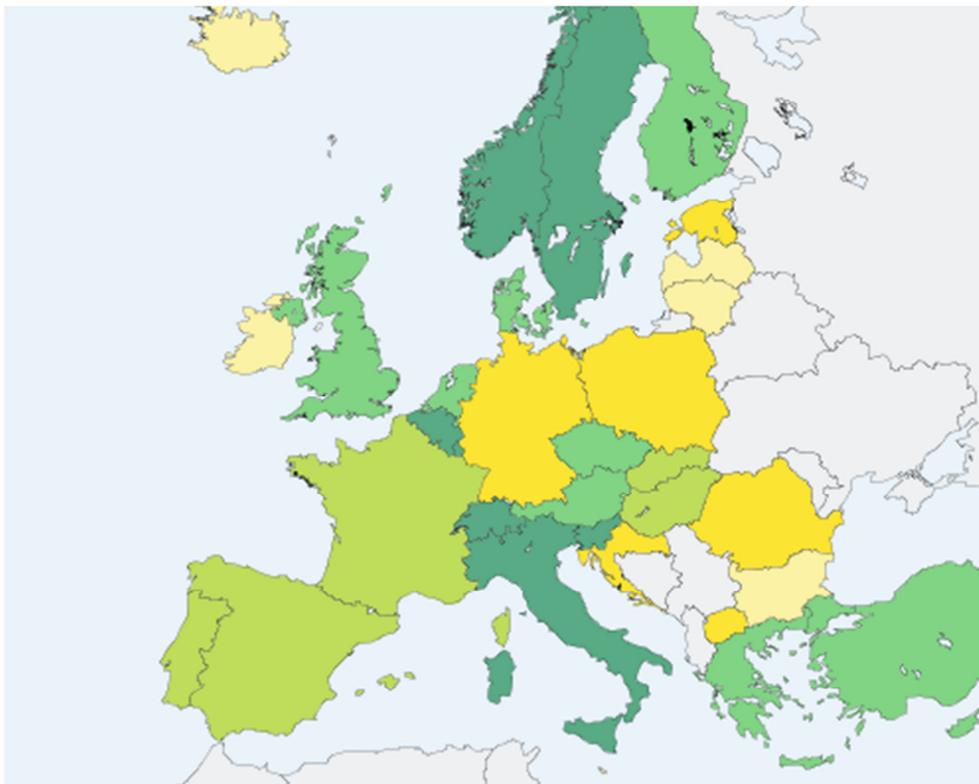
While immigration in the EU decreased in 2008, emigration grew by 13%. Furthermore, some countries (for example Poland) which had important immigration before 2008, have seen large numbers of their nationals return (see Table A-2 in Annex 1).

As shown in Figure 4.1, while in some countries immigration kept growing in 2009 (for example Italy gained 5.3 immigrants per 1000 inhabitants), in other countries emigration prevailed (in Ireland 6.2 persons emigrated per 1000 inhabitants and in Iceland the ratio was 15 to 1000) and in some countries the situation stagnated (Germany, Poland).

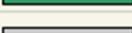
<sup>71</sup> European Commission, Eurostat (2010) p. 40

<sup>72</sup> Idem, p.41

Table 4.2 Rate of net migration in the EU-27, EEA and accession countries (2009)



*Definition: The ratio of net migration plus adjustment during the year to the average population in that year, expressed per 1000 inhabitants. The net migration plus adjustment is the difference between the total change and the natural change of the population.*

Legend	Cases
 -15.0 - -3.0	4
 -3.0 - 0.0	9
 0.0 - 3.0	12
 3.0 - 8.0	8
 8.0 - 13.2	2
 Data not available	0
Minimum value:-15.0	
Maximum value:13.2	
eu25: 1.9	

Source: Eurostat (tsdde230)

Reliable data on emigration is more difficult to gather because registration is always required at entry to a country, but tracking at exit is not practiced. Hence, less comparative information is available about outward mobility. Nevertheless, some information of relevance for this study has been gathered:

- Some EU countries (mainly among the countries that joined after 2004) have seen significant outflows of population recently (for example, it is estimated that 2.7% of the Polish labour force has moved to another EU country as of 2007<sup>73</sup>). Taking a more

<sup>73</sup> Maly Radek and Maier Christoph (2009): some descriptive evidence in Nowotny Ewald et al. (2009)

longer term perspective, Ireland has 8.5% of its citizens living abroad<sup>74</sup> and a new growth in emigration is being observed currently<sup>75</sup>;

- In the Netherlands, where emigration was relatively stable between 2006 and 2008, it grew by more than 20,000 people between 2008 and 2009<sup>76</sup>.
- In the United Kingdom emigration grew between 2007 and 2008, but fell back again to 2007 levels in 2009<sup>77</sup>.

It is also interesting to note that 17% of EU-27 citizens envisage working outside the country where they currently live (as of 2010) in comparison with 73% who do not envisage this option. Large differences exist among countries. Danes, followed by people living in other Nordic countries, the Baltic countries and Slovenia, are open to the possibility of working abroad (between 30% and 51% said yes to this option). At the other end of the spectrum, people living in Italy, followed by Austria, Greece, Cyprus, Czech Republic and Spain, do not envisage this option (between 80% and 85% responded 'no' to this question)<sup>78</sup>.

Therefore, despite the incomplete data on the mobility of workers, it is clear that there are important incoming and outgoing mobility flows in the EU countries studied. It can be assumed that an important share of this mobility (be it intra-EU or from outside the EU) is related to economic reasons,<sup>79</sup> meaning that the mobile individuals search opportunities in the host country labour market. As will be discussed below, for those who hold relevant qualifications, the possible lack of their recognition is an obstacle to mobility and/or to the effective use of their skills and competences<sup>80</sup>.

#### 4.3.2 Destination countries of mobile workers are diverse

The objective of this section is not to give a comprehensive overview of the populations' flows, but to give an idea of the main labour mobility flows illustrating the developments that are of importance for this study. As will be shown in this section, the mobility within the EU and towards the EU is surpassing the more traditional schema of mobility being driven by historical proximity (e.g. from past colonies) and linguistic proximity. These aspects are still an important element of choice for people who are mobile for work; for instance, Ireland has a high rate of worker mobility with the United States and Canada; and the United Kingdom with fellow Commonwealth states. Moreover, there are large inflows of Ukrainians and Belarusians to Poland due to its historical ties. However, there is evidence that more and more mobility is driven by other considerations (such as labour market needs and employment opportunities especially within the EU) – see for example, the large mobility of Polish workers towards countries like the UK or Ireland, but also Belgium or the Nordic countries. This has implications for the recognition of qualifications as will be discussed later.

When looking at intra-EU mobility, it is clearly supported by evidence that the 2004 and 2006 enlargements have increased the mobility within the EU. Nationals of the ten central and eastern European countries have been very mobile. As of 2007, nationals from the eight central and eastern European countries that joined in 2004, accounted for 4% of the total population in Ireland and more than one percent in Luxembourg, Austria and the UK. Bulgarian and Romanian nationals represented more than 1.4% of the total population in Spain and more than 0.6% of the population in Italy<sup>81</sup>. As shown in figure A-4 in Annex 1, in 2007 more than 5% of Romanian nationals lived in another country of the EU-15 and so did more than 3% of Bulgarians, Poles and Lithuanians<sup>82</sup>. The migration of nationals from the

<sup>74</sup> Idem

<sup>75</sup> European Commission, Eurostat (2010) p. 102

<sup>76</sup> Idem

<sup>77</sup> Idem

<sup>78</sup> European Commission (2011)

<sup>79</sup> See for example Fouarge Didier and Ester Peter (2007) p. 4 *Economic self-improvement ranks among the most influential individual-level determinants of the choice to migrate*

<sup>80</sup> See for example Makara Péter et al (2011)

<sup>81</sup> Gligorov Vladimir (2009)

<sup>82</sup> Compared to the other countries from the two latest enlargements, Czechs and Hungarians were relatively little mobile. However, nationals of these countries may be frequently engaging in trans-border employment. Idem.

newly acceding countries did not only follow the more 'traditional routes'<sup>83</sup>; for example, in 2007, persons from these countries represented 3.47% of the Icelandic total population. Relatively many also went to other Nordic countries: in Sweden, Denmark, Norway and Finland they represented between 0.4% and 0.46% of the total population<sup>84</sup>.

Neighbouring countries are another area where migrants towards Europe often originate from. As shown in Figure A-5 in Annex 1, between 4% and 8% of the population of neighbouring countries from Southeast Europe lived in the EU-15 as of 2007, while nearly 28% of the population of Albania lived in the EU-15 (mainly Italy and Greece).

As for student mobility discussed earlier, this variety of mobility pathways means that, in those countries that receive large numbers of mobile workers, there is potentially strong demand for qualification recognition for labour market insertion (be it formal or informal) from a variety of systems. As said earlier, if the variety of qualifications to recognise is high, it is likely that structured tools for recognition are needed.

#### 4.3.3 Most mobile workers are skilled but their skills are often not recognised

While there are important differences in the level of skills of migrants according to hosting countries in Europe, the Figure A-6 in Annex 1 shows that:

- In general, skilled workers are the most common group of migrants (in all countries the numbers of skilled migrant workers from third countries are higher than the numbers of low skilled or highly skilled);
- The numbers of highly skilled migrants are higher than those of low skilled migrants (with the exception of Italy).

Similarly within the EU, migrants tend to be mainly skilled (medium level qualifications) and the proportion of highly qualified individuals among people who are mobile, is higher than the proportion of highly qualified individuals within the sending country population<sup>85</sup>. Eurobarometer data also shows that highly qualified persons are more worried about the recognition of their qualifications and skills in the case of moving countries, than those with low or medium level qualifications<sup>86</sup>. This fear of non-recognition can constitute a barrier to their willingness to move. Given that countries often try to attract highly qualified persons (see Section 5), it is possible that well known and communicated mechanisms for qualification recognition could constitute a solution.

As described by Fargues (2005)<sup>87</sup> in an overview of migration trends from and towards Mediterranean countries:

*The classical notion of immigration, consisting of semi-skilled and unskilled workers, has been replaced by new types of labour migration. These consist of people trained in the scientific, professional and intellectual disciplines and include entrepreneurs, doctors, academics, highly-skilled technicians, engineers and intermediate and lower-level workers in the sectors of healthcare and education.*

However, despite the fact that migrants tend to have higher skills levels than they used to and that many countries have shortages in positions that require a qualified and highly qualified workforce, data shows that migrant workers are frequently under-employed (or in other words over-educated for the positions they occupy). Data from the UK that looks at the employment situation of migrants from Central and Eastern Europe shows that (see figure A-7 in Annex 1):

- At the same level of education, migrant workers are much more likely to be employed in positions below those corresponding to their qualifications;
- A large share of qualified and highly qualified migrants work in elementary occupations;

<sup>83</sup> Such as cultural, linguistic and geographical proximity

<sup>84</sup> European Integration Consortium (2009) p. 25

<sup>85</sup> Idem.

<sup>86</sup> Fouarge Didier and Ester Peter (2007)

<sup>87</sup> Fargues Philippe (2005) p.18

- Only a few qualified and highly qualified migrants work in positions of managers and professionals.

Interestingly, the under-utilisation of migrants' skills is worse for those who immigrated to the UK after the accession of these central and eastern European countries to the EU<sup>88</sup>. However, the over-qualification of migrants is probably not only related to the lack of recognition of qualifications and other aspects such as obsolescence of qualifications, may also have a role to play in this trend.

In Greece, an OECD study (2005) estimated that 39% of migrants were overeducated, compared to 9% of Greek workers. This over-education rate for migrants was found to be one of the highest in the EU<sup>89</sup>. In Ireland, more than half of non-Irish nationals (aged 24-34<sup>90</sup>) in the country have tertiary level qualifications, while less than 30% of Irish nationals (aged 24-34) have that level of qualifications<sup>91</sup>. Sixty-four percent of the non-Irish workers in Ireland feel like their skills and qualifications are a bit or much higher than what is required in their jobs compared to 55% of Irish workers<sup>92</sup>.

Similar information is captured in the ETF/Worldbank survey of potential and returning migrants in Albania, Egypt, Moldova and Tunisia<sup>93</sup>. The survey found that migrants from these countries work below their qualifications levels, but there are differences across countries. For example, migrants from Egypt are much more likely to occupy positions of professionals and managers than those from the other countries. These findings suggest that the way migrants' experiences (including qualifications) are valorised varies depending on aspects unrelated to their qualifications and profiles, such as the existence of diasporas abroad which facilitate access to good jobs,<sup>94</sup> but also the fact that many do not have access to legal employment<sup>95</sup>. The study also shows that returning migrants are not able to translate the experience they have accumulated abroad (be it in the form of formal, non-formal or informal learning) into improved employment prospects in their home country<sup>96</sup>.

The Table A-5 in the Annex 1 shows the share of foreign workers (be it from another EU country or from a country outside the EU) in certain economic sectors in several EU countries. It indicates that:

- Several countries have a significant share of foreign workers in professions related to housekeeping and restaurant services (these typically contain non-qualified or low-qualified positions);
- A few countries, like the UK and Ireland, have a significant share of foreign workers in health care professions: from nurses and midwives to medical doctors (typically qualified to highly qualified professions);
- Professions such as labourers in mining, construction, manufacturing and transport are vastly occupied by foreign workers (typically non-qualified or low qualified professions);
- Foreign workers are also present in professions related to skilled agricultural and fishery occupations, architecture and engineering or teaching, but with a few exceptions like Ireland, where this is not very common (these professions concern mainly qualified to highly qualified positions).

<sup>88</sup> European Integration Consortium (2009)

<sup>89</sup> Ibid

<sup>90</sup> This age range is used to avoid comparison of relatively young migrant population with the whole Irish population (especially given that the education levels of the older Irish generations are significantly lower than those of younger generations)

<sup>91</sup> McGinnity Frances, Quinn Emma, O'Connell Philip J and Donnelly Nora (2010), p.21

<sup>92</sup> Idem, p.46

<sup>93</sup> Sabadie Jesús Alquézar, Avato Johanna, Bardak Ummuhan, Panzica Francesco and Popova Natalia (2010)

<sup>94</sup> Idem p. 46

<sup>95</sup> Idem, p. 57

<sup>96</sup> OECD (2005 b) cited in Kanellopoulos Nikolaos C. and Cholezas Ioannis. (2006) p. 55

#### 4.3.3.4 Implications for qualifications frameworks

The data discussed above illustrates the following:

- Mobility of workers within the EU and towards the EU from other countries grew in numbers, in the last decade, thus creating greater demand for the recognition of qualifications;
- Mobility is not restricted to regions which have historical and cultural proximity and where the qualifications of migrants are more likely to be easily understandable for host countries. Therefore, there is likely to be a greater need to use formal systems which facilitate the recognition of qualifications;
- The economic recession has created situations where workers are returning to their home countries (for example, in Poland) or are emigrating (from countries which had a great deal of immigration in the past decade). These returning nationals may have achieved not only working experience, but also qualifications abroad. Consequently, when they return they may need to have these qualifications recognised;
- A large share of migrants are qualified or highly qualified persons, but they tend to work below their skill levels despite the fact that their host countries experience skills shortages which they are not able to address through internal labour force supply (see also Section 5);
- The numbers of migrants who fill in positions in key professions such as health professionals, medical doctors, nurses or engineers remain rather low despite the willingness of countries to attract migrants into these sectors (see Section 5).

The above information shows that without structured mechanisms and support, mobile workers' qualifications are not recognised adequately. This creates brain waste and situations where neither the host country nor the country of origin benefit fully from the potential of the migrant person, despite the fact that they have received medium to high level education and often also possess professional experience.

#### 4.4 Workers' mobility in Australia

The only example of free worker mobility in the Australian context (comparable to the free movement of labour within the EU) is with New Zealand. The 1973 Trans-Tasman Travel Arrangement<sup>97</sup> has allowed Australian and New Zealand citizens to enter each other's countries to visit, live and work, without the need to apply for authority to enter. The rate of movement of New Zealanders to and from Australia relates primarily to the economic conditions prevailing in both countries. In particular, the number of New Zealanders in Australia increases in times of economic buoyancy in Australia relative to New Zealand and decreases when economic conditions are slow. As of 30 June 2010, an estimated 566,815 New Zealand citizens were present in Australia.

New Zealand citizens are not counted as part of Australia's annual migration program. They are included in settler arrival and net overseas migration figures (when arriving or leaving for more than a 12-month period).

In the 2009–10 financial year 36,519 New Zealand citizens came to Australia as permanent settlers (24,447) and 'long-term arrivals' (12,072). This represented a decrease of 23.6% on the previous year, which may be attributed to the global financial crises in 2008–09. Permanent and long-term departures of New Zealand citizens amounted to 16,700 in 2009–10, so that net permanent and long-term movement was 19,819, a decrease of 38.1% from the previous year and a significant downturn from the high growth of 2007–08<sup>98</sup>.

Apart from the New Zealand Arrangement, access to work opportunities in Australia is always in the context of managed immigration. There are various streams in the immigration arrangements that address the situations of groups that are not relevant to this study – e.g. students, business persons, migrants' family members. The key control mechanism in

<sup>97</sup> Government of Australia (1981)

<sup>98</sup> Govt. of Australia, Dept. of Immigration and Citizenship (2011 a)

relation to worker mobility is the Skill Stream of Australia's Migration Program, which is specifically designed to target migrants who have skills or outstanding abilities that will contribute to the Australian economy by addressing specific skill shortages and enhancing the size and skill level of the Australian labour force. The Skill Stream outcome is governed by a set target for each year rather than by the rate of application. The 2008–09 Skill Stream outcome was 114,777 places; the program planning level had been cut by 14% from 133,500 to 115,000 in mid March 2009 in light of the economic situation. The 2009–10 Skill Stream was further reduced to a planning level of 108,100, realising an outcome of 107,868. The planning level for the Skill Stream of the 2010–11 Migration Program has been set at 113,850<sup>99</sup>. In general, it should be noted that the criteria and targets of the Migration Program are regularly altered in response to circumstances and in line with policy changes, with notable changes occurring in 2010 and in 2011.

#### 4.4.1.5 Skill levels and employment positions of migrant workers

The Continuous Survey of Australia's Migrants (CSAM)<sup>100</sup>, began in late 2009, underpins the analysis of how recent migrants are performing in the labour market. The survey asked a range of questions and made use of administrative data to establish a general profile of both skill stream and family stream migrants. Some key characteristics are reported:

- Almost two-thirds (64%) of Skill Stream migrants were male.
- More than 90% of those from the Skill Stream either spoke English as a first language or rated themselves as good or very good English speakers. Less than one in four migrants came from a country where English was the main language spoken.
- Two thirds of Skill Stream visa holders had a university qualification (at the bachelor or higher degree level). According to the 2009 ABS Survey of Education and Work, the equivalent figure for the general population of people aged 15-64 is just 23%. This demonstrates that migrants are adding to the stock of skilled workers in Australia.

It should be noted that these figures relate only to the primary applicants in the Skill Stream.

Table 4.3 Highest education qualification of skilled stream migrants (Australia)

<b>Doctorate</b>	3%
<b>Master's degree</b>	24%
<b>Bachelor degree</b>	39%
<b>Other post grad qualification</b>	3%
<b>Diploma level</b>	12%
<b>Certificate level</b>	9%
<b>No post school qualification</b>	10%

Source: Commonwealth of Australia ( 2010) *How new migrants fare: Analysis of the Continuous Survey of Australia's Migrants*

Table 4.4 Employment outcomes of Skill stream migrants after six months (Australia)

<b>Full-time</b>	75%
<b>Part-time</b>	15%
<b>Unemployed</b>	5%
<b>Not in labour force</b>	5%

Source: Commonwealth of Australia ( 2010) *How new migrants fare: Analysis of the Continuous Survey of Australia's Migrants*

<sup>99</sup> Govt. of Australia, Dept. of Immigration and Citizenship (2011 c)

<sup>100</sup> Commonwealth of Australia ( 2010)

Table 4.5 Occupations of Skill Stream migrants (Australia)

<b>Managers &amp; Administrators</b>	6%
<b>Professionals</b>	45%
<b>Associate Professionals</b>	13%
<b>Tradespersons</b>	11%
<b>Advanced Clerical</b>	2%
<b>Intermediate Clerical Sales &amp; Service Workers</b>	10%
<b>Intermediate Production &amp; Transport Workers</b>	2%
<b>Elementary Clerical</b>	6%
<b>Labourers &amp; Related Workers</b>	5%

Source: Commonwealth of Australia (2010) *How new migrants fare: Analysis of the Continuous Survey of Australia's Migrants*

#### 4.4.1.6 Countries of origin of migrants

Since early 1945, seven million people have entered Australia as new settlers. In the 64 years of planned post-war migration, Australia has seen a population rise from around 7 million to over 21.5 million. Today, nearly one in four of Australia's 21 million people were born overseas. In recent years, New Zealand has been the major source country for settlers.

The number of settlers arriving in Australia between July 2008 and June 2009 totaled 158,021. They came from more than 200 countries. Most were born in New Zealand (16.2%), the United Kingdom (13.6%), India (10.9%), China (10.0%) and South Africa (4.6%)<sup>101</sup>.

Table 4.6 Settler arrivals by region of birth between July 2008 and June 2009 (Australia)

<b>Region of birth</b>	<b>Arrivals</b>
Oceania and Antarctica	30,010
Europe	29,294
North Africa and the Middle East	11,143
South East Asia	21,008
North East Asia	20,977
Southern Asia	25,900
Central Asia	1,731
Northern America	2,254
South and Central America and the Caribbean	1,979
Sub-Saharan Africa	13,025
Supplementary country codes	671
Not stated/not elsewhere included	29
<b>Grand total</b>	<b>158,021</b>

Source: Govt. of Australia, Dept. of Immigration and Citizenship (2011) *Fact Sheet 2 – Key facts in immigration*

<sup>101</sup> Govt. of Australia, Dept. of Immigration and Citizenship (2011 b)

Table 4.7 Major source countries (Australia): July 2008 to June 2009 settler arrivals, by country of birth

Country of birth	Arrivals
New Zealand	33,034
United Kingdom	21,567
India	16,909
China (excludes SARs and Taiwan)	14,935
Philippines	5,619
Iraq	4,008
Sri Lanka	3,918
Malaysia	3,261
Burma (Myanmar)	2,931

Source: Govt. of Australia, Dept. of Immigration and Citizenship (2011) *Fact Sheet 2 – Key facts in immigration*

#### 4.4.1.7 Implications for qualifications frameworks

The data outlined above indicates that:

- Worker mobility into Australia is a managed process, geared to meeting the area of specific demand in the labour market; not surprisingly, this results in high levels of success in finding work by skilled migrants;
- While traditional sources (New Zealand and UK) continue to supply Australian immigration needs, there is a significant and growing supply from China, India and other Asian countries. This trend should be interpreted alongside the rapid growth in mobile student numbers from these countries into the Australian education system – these students will acquire Australian qualifications that will enable them to compete strongly for skilled migration places in the future;
- The majority of skilled migrants (i.e primary Skill Stream applicants) have high levels of qualifications – two thirds have bachelor degrees or higher.

This information highlights the trend towards highly-qualified workers in the migrant worker cohort in Australia. This trend explains the importance of qualifications in the Australian immigration process and, consequently, the high stakes involved in qualifications recognition. Any mechanism that assists in the qualifications recognition process – such as the location of a qualification in a national qualifications framework – is a valuable asset for the holder in approaching Australian immigration as a skilled migrant applicant.

## 5 Qualifications as elements of policy frameworks to support mobility

The previous section has shown the existing trends in the mobility of students and workers which are relevant for the issue analysed in this study. It shows that such mobility is already taking place (though country specific trends vary greatly) creating demand for qualification recognition in different contexts (for pursuing further studies, for labour market insertion in the host country or on return to the home country). This section will show that the demand and need for qualification recognition could continue growing in the future. This assumption is based on the analysis of countries' strategies to internationalise education and training and policies to regulate or facilitate workers' transnational mobility. The section discusses separately the strategies to attract foreign students and those to govern workers' mobility.

### 5.1 Attracting foreign students is important for all countries studied

Internalisation of education is on the policy agenda in most studied countries. The concept is broader than mobility,<sup>102</sup> but it covers aspects such as promotion of studies abroad, recruitment of foreign students and attracting international outstanding researchers and academics. The countries with an established reputation on the international education market (such as United Kingdom or Australia) as well as other countries, relatively new in this field (such as the Netherlands or Poland), are now welcoming international students and launch various internationalisation strategies in order to promote their educational system abroad.

The Table 5.1 shows that:

- All countries have in place some measures to enhance incoming mobility of students. While a few (Greece, Italy, Poland) use more traditional measures and attract students through scholarships, others target fee paying 'free-movers';
- Quality of education and training as well as the quality of qualifications (and of knowledge, skills and competence that they certify) is considered as a strong argument for promoting home (higher and VET) education systems worldwide (Germany, Netherlands, Ireland, UK and Australia);
- Qualifications frameworks as well as the EQF are explicitly mentioned in internationalisation strategies of Ireland and Malta education systems;
- Qualification recognition is also explicitly mentioned in the strategies of Australia (in particular recognition by employers) and the Netherlands.

It is worthwhile noting that the Ireland Internationalisation Register, which lists courses that are accessible for non-EEA<sup>103</sup> students who apply for a student visa (including preparatory language courses), is linked to the National Qualifications Framework. Also of interest is the fact that Ireland has defined a minimum qualification level for which a programme accessible to non-EEA students has to prepare in order for these applicants to receive a student visa (level 5 of the NQF corresponding to level 4 of the EQF)<sup>104</sup>.

<sup>102</sup> See for example Brandenburg Uwe and Federkeil Gero (2007)

<sup>103</sup> European Economic Area (EU-27 + Iceland, Liechtenstein, Norway)

<sup>104</sup> High-Level Group on International Education to the Tánaiste and Minister for Education and Skills (2010)

Table 5.1 The role of mobility and of qualifications in internationalisation strategies of studied countries

Country	Explicit link to qualifications	Summary
<b>Germany</b>	Partly	The strategy paper <i>'Bildung und Forschung weltoffen - Innovation durch Internationalität'</i> <sup>105</sup> (2002) outlines Germany's objectives for policy and practice in education and research including enhancing mobility of German students but also attracting foreign students towards Germany. Germany also promotes mobility in the vocational education and training sector <sup>106</sup> in particular through bilateral agreements and programmes, but also through the IMove initiative which aims at supporting cooperation between foreign parties and German partners in vocational education and training <sup>107</sup> . The quality of training and of qualifications are seen as key in both higher education and vocational education and training internationalisation approaches.
<b>Greece</b>	Not clear	Traditionally focusing on providing opportunities to the Greek diaspora abroad to study in Greece, the scholarships of the Greek Government to students coming to Greece have been expanded to other targets in the past years <sup>108</sup> .
<b>Ireland</b>	Yes (explicit mention of the NQF)	Ireland's International Education Strategy (2010-15) reviews the positioning of Irish education on the international market and provides the vision for Irish education internationally. It insists on the promotion of high quality international education and this is explicitly related to the role of the National Qualifications Framework. The qualifications accessible to non-EEA students eligible for visa acquisition (Internationalisation Register) are to be linked with accreditation in the NQF. Non-EEA students' (wishing to enter Ireland on a student visa) will only be able to apply for studies leading to qualifications at minimum level 5 of the Irish NQF (EQF level 4). The strategy also states that: <i>Ireland's National Framework of Qualifications (NFQ) and the European Qualifications Framework (EQF) facilitate worldwide recognition of Irish qualifications</i> <sup>109</sup> .
<b>Italy</b>	Not clear	There is willingness to improve the mobility of students (incoming and outgoing) as well as of academics and additional funds were allocated to these purposes in the second half of the 2000's <sup>110</sup> .
<b>The Netherlands</b>	Partly (Yes in VET)	The Dutch internationalisation agenda <i>Het Grenzeloze Goed</i> , aims among other things at improving the awareness of Dutch higher education abroad and at enhancing the mobility of Dutch students and teaching staff as well as at attracting foreign students. Quality of education provided by Dutch higher education institutions is emphasised as well as the quality assurance measures (accreditation) in place and the mutual recognition of accreditation arrangements <sup>111</sup> . The internationalisation strategy for the VET sector explicitly mentions the need for qualifications recognition of professionals and the potential role of the EQF in this context <sup>112</sup> .
<b>Malta</b>	Yes (explicit)	Malta 'Further and Higher Education Strategy 2020' has the following priorities relevant for the topic of this study: 1) attract foreign fee

<sup>105</sup> Federal Ministry of Education and Research (2002)

<sup>106</sup> Federal Ministry of Education and Research (2005)

<sup>107</sup> Federal Ministry of Education and Research: IMove

<sup>108</sup> GHK (2010 a)

<sup>109</sup> High-Level Group on International Education to the Tánaiste and Minister for Education and Skills (2010)

<sup>110</sup> GHK (2010 b)

<sup>111</sup> Dutch Ministry of Education (2008)

<sup>112</sup> Dutch Ministry of Education and Research (2009)

	mention of the qualifications framework)	paying students to study in Malta in various fields of study and research 2) develop Malta's Qualifications Framework and qualification recognition services 3) facilitate and promote student and teacher mobility <sup>113</sup> . The referencing to the EQF is also clearly seen as means to support the comparison of Maltese qualifications to foreign qualifications.
<b>Poland</b>	Not clear	The Polish government places a growing emphasis on the internationalisation of Polish education and the provision of information on international cooperation programmes to schools and academic institutions. It is reflected by an increasing financing of international cooperation programmes <sup>114</sup> .
<b>United Kingdom</b>	Yes	The PMI2 strategy aims to secure the UK's position as a leader in the international education market and sustain managed growth of UK international education, delivered both in-country and overseas. This five-year strategy focuses on new countries as well as strengthening relationships in countries where there are well established ties. <sup>115</sup> It aims to attract an additional 100,000 overseas students to study in the UK. Promotion of the <i>Education UK</i> brand puts emphasis on communicating about the quality of UK higher education qualifications <sup>116</sup> .
<b>Australia</b>	Yes	The International Student Strategy is led by Australian Education International (AEI). A key element in the International Student Strategy is the continued promotion of the well-established 'Study in Australia' brand. Part of this strategy are efforts to improve the perception of Australian education abroad, and it is acknowledged that this perception can be enhanced by ensuring that the qualifications that students achieve in Australia are recognised as widely as possible. The strategy in particular emphasises the broad recognition of Australian qualifications by employers <sup>117</sup> . As described in Section 4, there is already strong international mobility in VET.

<sup>113</sup> National Commission for Higher Education (2009)

<sup>114</sup> GHK (2010 c)

<sup>115</sup> British Council: About PMI2

<sup>116</sup> British Council: What is Education UK

<sup>117</sup> Australian Education International (July 2010 b).

Regarding bilateral agreements on qualification recognition, the Table A-6 in Annex 1 shows that there are basically two situations:

- Countries that maintain a multiplicity of bilateral agreements (e.g. Italy) on qualification recognition for the purpose of further studies; and
- Countries which have moved away from the model of bilateral agreements towards a more decentralised approach and one that relies on case-by-case assessment of qualification equivalence (e.g. Ireland, Poland).

With the exception of Greece<sup>118</sup>, all the countries studied here have signed and ratified the *Lisbon Convention on the Recognition of Qualifications concerning Higher Education in the European Region*<sup>119</sup>. This convention defines the basic principles for qualification recognition in view of continuing further studies as well as those regarding the recognition of periods of study abroad. The core idea of the convention is that applicants have the right to an assessment of their qualifications which is fair, carried out within reasonable time limits and follows procedures that are transparent, reliable and non-discriminatory. According to the convention, to refuse recognition, significant difference between qualifications in the home and the host country has to be demonstrated by the authority in charge.

### 5.1.2 Implications for qualifications frameworks

This rapid review of information about policy frameworks to internationalise education and training shows that:

- All countries reviewed are deploying efforts to support the internationalisation of their tertiary education (and higher education in particular) systems;
- Internationalisation strategies (especially of countries which do not have a long standing tradition in provision of international education) have as a strong pillar the communication about their country's system, including the improvement of the understanding of qualifications awarded (within the European Higher Education Area this is partly addressed through the harmonisation of higher education cycles);
- Some countries which have qualifications frameworks in place link internationalisation strategies with the frameworks in one way or another;
- Not all countries, but some are also interested in increasing the mobility of their own nationals (Germany) and in this context ensuring the recognition of the qualifications they award abroad (Malta, Netherlands);
- Internationalisation of VET is so far less developed than that of higher education, but one of the countries studied (the Netherlands) has a clear strategy in this area while others (Germany and Australia) promote international cooperation of their VET providers without an explicit strategy;
- There does not appear to be a generalised trend of mushrooming of bilateral agreements on the recognition of qualifications. Some countries have many of these (Italy), of which only a few are recent and many date back to the nineties. Others seem to be moving towards a system where the qualifications of applicants are examined on an individual basis.

From the above synthesis, the following can be implied about the potential role of qualifications frameworks:

- The demand for qualifications recognition can be expected to grow as the numbers of mobile students should continue growing, supported by policy efforts. As said earlier, such growth can be expected to favour using systematic tools to support recognition, including qualifications frameworks. The usefulness of qualifications frameworks could become even stronger if the mobility in the VET sector grows as the variety of qualifications types and structures is greater in this field;

<sup>118</sup> Greece is the only EU-27 country which has not signed nor ratified this convention

<sup>119</sup> Council of Europe

- Qualifications frameworks, and their referencing to the EQF for the EU countries, are being used as an element of promotion and of communication about national qualifications worldwide;
- The explicit use of frameworks for the regulation of student mobility<sup>120</sup> arrangements is for the moment rare. Only Ireland conditions the eligibility for student visas, by the fact that the qualification is in the national qualifications framework and at a certain minimum level. It is difficult to assess whether such use of frameworks will further develop as most countries formulate restrictions on eligible education programmes in different terms (e.g. type of programme or education and training institution).

## 5.2 Policies to attract foreign workers

Section 4 showed that all countries studied have significant levels of workers' mobility: either incoming or outgoing. This section will show that several of the countries covered in this study actively support such mobility through policies to attract certain profiles of people. However, there are important differences as to:

- The profile of persons that countries are aiming to attract (not all countries studied here aim at attracting qualified persons);
- The means that countries deploy to encourage labour market mobility.

The European Migration Network review of how countries use migration to meet labour market shortages shows that many countries recognise that the national supply of human resources is not sufficient to satisfy the labour market demand. These countries are willing to recruit migrants from countries outside the EU (some also wish to recruit people from within the EU, however this aspect is not covered by that study). In the identified professions, countries are linking visa and work-permit procedures with particular skills and possibly qualifications. A list of professions and areas where countries are facing skills shortages is presented in Table 5.2 below (based on the European Migration Network national reports). It shows that a vast majority of professions where countries are looking to or willing to 'recruit' workers from abroad concern qualified or highly qualified professions.

Table 5.2 Professions where EU countries are facing skills shortages

Profession	Countries that indicate skills shortages in this area
<b>Engineers</b>	Austria, Belgium, Germany, Hungary, Ireland <sup>121</sup> , Latvia, Luxembourg, Sweden, United Kingdom
<b>Health care</b>	Austria, Belgium, Finland, Germany, <sup>122</sup> Ireland, Italy (nurses), Latvia, Malta, Netherlands, Slovenia, Sweden, United Kingdom
<b>Banking and financial services</b>	Ireland, Luxembourg, Poland
<b>Administrative and clerical work</b>	Finland, Germany, Ireland
<b>Construction</b>	Bulgaria, Finland, Italy, Lithuania, Poland, Portugal, Slovenia, Spain
<b>Catering</b>	Lithuania, Luxembourg, Malta, Poland, Portugal
<b>Transport</b>	Ireland, Italy, Lithuania, Spain
<b>Industrial production</b>	Bulgaria, Finland, Italy, Malta, Netherlands, Spain
<b>Machinery and Equipment operations</b>	Belgium, Estonia, Lithuania
<b>Agriculture and Forestry</b>	Bulgaria, Finland, Italy, Netherlands, Poland, Spain
<b>IT specialists</b>	Belgium, Bulgaria, Germany, Hungary, Ireland, Latvia, Malta, Slovenia, Sweden, United Kingdom
<b>Science</b>	Ireland
<b>Real estate activities</b>	Poland, Portugal
<b>Services</b>	Bulgaria, Italy, Malta, Netherlands, Portugal, Germany
<b>Secondary teachers of mathematics and science</b>	United Kingdom
<b>Sales managers and retail sale persons</b>	Lithuania (in Ireland niche areas like telesales with specific language requirements or sales representatives with particular technical knowledge are also concerned)

<sup>120</sup> In particular between an EU country and non-EU countries

<sup>121</sup> The 2010 National Skills Bulletin in **Ireland** indicated that no labour shortages exist and that only limited skills shortages exist in the areas listed

<sup>122</sup> A distinction is made in **Germany** between vacancies which need to be filled immediately and vacancies which need to be filled in the near future.

<b>Tourism</b>	Bulgaria
<b>Wood processing and furniture making</b>	Bulgaria

Source: European Migration Network (2011) *Synthesis report: Satisfying Labour Demand through migration*

The Table 5.3 shows a synthesis of countries' policies towards migrant workers from countries outside zones of free movement of persons. Regarding non-regulated professions, the following conclusions can be drawn from this review:

- The vast majority of countries have favourable conditions for receiving highly qualified persons;
- The definition of a highly qualified person is in most cases related to employers' willingness to pay a minimum salary. This is set at a level at which employers are only expected to recruit highly qualified persons. It implies that it is the employer who makes the decision of recognising one's qualification;
- Only in the UK and the Dutch pilot programme, is the status of highly qualified migrants related to the actual type and level of a person's qualification;
- In Australia, skilled or highly qualified migrants, in order to apply for an occupation on the skilled occupation list, have to go through a skills assessment (see below);
- Not all countries studied have policies to attract skilled migrants – there is no such mechanism in place in Greece;
- Poland and Italy use an annual quota system for temporary migration which is not related to specific professions nor qualifications;
- Several countries use lists of professions where shortages are recognised and where it is easier to recruit foreign skilled workers (Ireland, Australia, Germany, the Netherlands, and UK). However, in most cases, the application for such a visa is conditioned by the fact that a person holds an employment offer (meaning that it is the employer who has to make a judgement on qualification recognition). An additional layer in this process is the provision of evidence that the position cannot be filled through the available supply of workforce in the country;
- Documents about qualification recognition in the context of migration in the UK and Ireland mention the use of national qualifications frameworks;
- Only in Australia, do foreign applicants for skilled positions have to undergo a process of qualification recognition (using a points system), which may also include skills assessment (see below). In Europe (for applicants from outside the EU), equivalent procedures only seem to exist for skilled or highly skilled migrants in health care professions (for example in Ireland or the UK).

**Table 5.3 Summary of the information about the role of qualifications in migration policies (non-regulated professions)**

	<b>Highly skilled workers</b>		<b>Skilled workers</b>	
	<b>Favourable conditions</b>	<b>How do the criteria relate to persons' qualification</b>	<b>Favourable conditions</b>	<b>How do the criteria relate to persons' qualification</b>
<b>Germany</b>	Yes	Not directly – the criteria is linked to an employer's offer and willingness to pay a high salary. In addition, the permit is conditioned by an approval of an employment agency based on availability of the local labour force.	Yes, in some (restricted) cases	Not directly – permit is conditioned by the approval of the employment agency (as before) and an employer's offer to the candidate.
<b>Greece</b>	Yes, but very restricted	Not related to qualifications but to professions occupied.	No	
<b>Ireland</b>	Yes	It is assumed that employers will only be able to pay the defined salary for highly qualified persons. The qualifications and skills expected and those held by the employee has to be described in the application form + supported	Yes, for certain professions only	First selection is made by the employer who has to be willing to employ the person. The qualifications and skills expected are described in the application form and so are the qualifications and skills held by

		by evidence (certified copies). Medical professions require validation of qualifications by professional bodies.		the candidate (with supporting evidence). This is used by the authorities to make a judgement on whether local resources could be used instead.
	The qualifications authority has developed an online International Qualifications Database which lists certain foreign qualifications and provides advice regarding the comparability of the qualification to those that can be gained in Ireland. The foreign qualifications are compared to those in the Irish National Framework of Qualifications. This is considered to facilitate the recognition process. <sup>123</sup>			
<b>Italy</b>	Yes, but the category is very restricted	Not clear	Not a specific category	Not specifically - the permissions of skilled workers are in general governed by a quota policy. In case of agreements with certain countries, those applicants who received specific training (see below) are privileged.
<b>Malta</b>	Yes	Candidates' qualifications are examined against the profession in which they will be employed.	Yes, but very restricted	As before
<b>The Netherlands</b>	Yes	In general, it is not clearly related to the qualification if the person has an employment offer with the required annual wage. A pilot scheme for people who hold a master's degree or a PhD degree is being tested – priority is given to qualifications from certain higher education institutions (attracting excellence).	Yes	It is conditioned by the offer from an employer and the proof that no Dutch employees can fill in the vacancy. It is not linked to formal recognition of qualifications.
<b>Poland</b>	It is not a category as such	People in some very specific professions, such as academics, have favourable conditions, but this is not related to their qualifications but the professions they practice.	Yes	Quotas for Belarus and Ukraine (also concerns low skilled)
<b>United Kingdom</b>	Yes	Applicant has to hold a degree equivalent or higher to a bachelor degree. Vocational qualifications at these levels are taken into account. Equivalence with levels is established by the UK NARIC centre.	Yes	Skilled professions are defined among other things, by the NQF level <sup>124</sup> . In most cases, it is for the employer to make a judgement on whether the person holds the necessary qualifications. The candidate needs to provide evidence of a sufficient level of English language skills which includes a test or recognition of a degree taught in English.
<b>Australia</b>	Yes, for certain professions	Same as for skilled workers.	Yes, for certain professions only	Skills assessment is done by designated professional bodies. This is based on the assessment of the applicant's qualifications, prior working experience and English proficiency.

Source: own analysis of information published on official websites of government institutions

<sup>123</sup> See Quinn (2010) p. 36-37

<sup>124</sup> The UK Border Agency initially defined a skilled occupation as one that is skilled to at least level 3 of the National Qualifications Framework (equivalent to EQF level 4). It is expected that this requirement will be raised in 2011. Salt John et al (2011)

For recruitment of non-EEA workers into regulated professions, qualification recognition is required. Only some European countries appear to have measures in place that enable nationals from outside the EU to get qualifications recognised for this purpose. The examples below show how certain countries address the issue of qualification recognition for regulated professions:

- In Poland, only a restricted category of migrants from countries outside the EEA can get access to the procedure to recognise their foreign qualification for a regulated profession (namely: family members of persons with EEA citizenship, persons holding a long term residence permit in the EU<sup>125</sup>);
- In Germany, the rules for the recognition of qualifications linked to regulated professions vary from one Lander to another resulting in a complex system in which it can be difficult to get qualifications recognised<sup>126</sup>;
- In Ireland, migrants from non-EEA countries wishing to practice regulated professions have to apply for recognition to the related competent authority<sup>127</sup>;
- In Bulgaria, the Act for Recognition of Professional Qualifications (2008) stipulates that citizens of countries outside the EEA with which Bulgaria has an international agreement, can gain qualification recognition for practicing a regulated profession. The qualification of the applicant has to match the normative requirements for obtaining the same professional qualification in Bulgaria<sup>128</sup>;
- In the Czech Republic, the situation varies depending on the type of regulation. For cases where a qualification recognition is required to get a trade licence in order to set up a business in one of the areas regulated by the trade licence act, nationals of countries outside the EEA need to get academic recognition for their qualifications (nostrification)<sup>129</sup>. For medical professions, candidates have to get academic recognition for their qualifications and undergo an assessment<sup>130</sup>.

### 5.2.2 Examples

The overview above showed that only a few countries relate their policies to attract migrant workers (from countries outside the zones of free movement) to some form of qualification recognition (with the exception of regulated professions). In most cases, the decision to recognise the qualifications of potential migrant workers is left upon the future employer. In Germany, this takes the form of an obligation and employers have to *ensure that the third-country national applicant meets the requirements of the business in terms of training, qualification and language skills*<sup>131</sup>.

This section discusses in more detail some approaches used in the countries studied to enable better matching between migrant workers and available employment opportunities.

The **United Kingdom's** immigration policy is based on the points-based immigration system, which gives point to age, education, earning and previous UK experience, thus selecting the 'best' migrant workers to come in. The managed migration system in the UK is designed to attract highly skilled overseas workers, entrepreneurs, investors and students to the UK. The points-based system is composed of five tiers, described by the UK Border Agency<sup>132</sup> as follows<sup>133</sup>:

<sup>125</sup> Polish National Contact Point to the European Migration Network (2010)

<sup>126</sup> Parusel Bernd and Schneider Jan (2010 a)

<sup>127</sup> Quinn (2010)

<sup>128</sup> Bulgarian Ministry of Interior (2010)

<sup>129</sup> Trade Licence act – Zákon ze dne 2. října 1991 o živnostenském podnikání (živnostenský zákon)

<sup>130</sup> Web-site of the Ministry of health care of the Czech Republic

<sup>131</sup> European Migration Network (2011) p.80

<sup>132</sup> UK Border Agency

<sup>133</sup> UK Border Agency

- Tier 1 – for highly skilled individuals, who can contribute to growth and productivity. For the general profile under this tier the applicant has to hold a qualification that is equivalent or higher than a bachelor degree. The equivalence of qualifications levels is based on the information provided by NARIC UK. Professional qualifications can be considered equivalent to the levels of bachelor, master's and PhD degrees and the judgement is made by NARIC.
- Tier 2 – for skilled workers with a job offer, to fill gaps in the United Kingdom workforce. For this type of work permit, a person has to demonstrate sufficient language skills either by a test or by providing evidence that they hold an academic degree which was taught in English (professional or vocational qualifications are not applicable). The definition of skilled occupations, as defined by the UK Border Agency, is that the skills required are at least at level 3 of the NQF – equivalent to level 4 of the EQF (this is expected to be increased in 2011 so as to tighten migration rules)<sup>134</sup>.

This tier also concerns overseas qualified nurses, student nurses and student doctors.

For shortage occupations, it is up to the employer to make a judgement on whether the person has the appropriate qualifications and/or skills.

- Tier 3 – for limited numbers of low-skilled workers needed to fill temporary labour shortages<sup>135</sup>.

**Australia** pursues a managed migration policy designed to attract workers with skill-sets required by the Australian economy. In Australia, the main pathway to permanent residence is through the Migration Program. The only other way for migrants to obtain permanent residence is to be accepted into Australia on humanitarian grounds.

Australia's skilled migration programmes select applicants with skills (recognised qualifications and relevant work experience) and high levels of English proficiency which are appropriate to employment in skilled (managerial, professional and trade) occupations. The migration programmes do not target particular source countries.

There are two major categories within the Migration Program:

- The Skill Stream — aimed at migrants who have skills, proven entrepreneurial capability or outstanding abilities that will contribute to the Australian economy. In 2010-11, the Skill Stream quota is set at 113,850 places.
- The Family Stream — enables the migration of immediate family members such as spouses, children, parents and certain other members of extended families. In 2010-11, the Family Stream is set at 54,550 places.

The Skill stream is the relevant category corresponding to the definition of worker mobility adopted for this study. Within the Skill Stream there are three main components—General Skilled Migration, Employer Sponsored and Business Skills.

- General Skilled Migration (GSM) is for persons who are **not** sponsored by an employer and who have skills in particular occupations required in Australia. This is a main lever used to attract highly-qualified people or people from particular occupations. To qualify as a skilled migrant the applicant is required to have an occupation on Australia's skilled occupation list. This is a list of 185 targeted occupations determined by the independent body, 'Skills Australia'.
- Employer Sponsored Migration allows Australian employers to sponsor and employ foreign workers to fill skilled vacancies in their businesses.
- Business Skills Migration allows the entry of suitably qualified business persons into Australia.

To apply for an occupation on the skilled occupation list, the candidate has to go through a skills assessment. The skills assessment process is carried out by designated bodies who

<sup>134</sup> Salt John et al (2011)

<sup>135</sup> In the past, this category used to relate to the NVQ qualifications level – below NVQ level 3. Idem.

are responsible for the recognition of professional qualifications in the relevant field and who assess the qualification of the applicant as well as his/her prior working experience. The skills assessment includes the verification of the veracity of documents provided. Relevant qualifications, skills and work experience are allocated points which contribute to the GSM points test. In the points test, among other aspects, qualifications are allocated points as follows:

- 10 points for either of these: offshore recognised apprenticeship, Australian Qualifications Framework Certificates level III or IV and Diploma (all three completed in Australia);
- 15 points for bachelor or master's degrees;
- 20 points for a PhD.

**Ireland's** 'national vision' on labour migration can be summarised as follows: to meet all labour and skills needs from within the enlarged EEA as far as is possible, and to limit non-EEA labour migration to that of the most highly skilled and hard to find workers, sourced by way of an employer-led system.<sup>136</sup> In other words, the State only issues a permit where a genuine shortage exists and in Ireland the main means of controlling for this is via the 'ineligible occupations list' for work permit applications and the 'restricted list' for lower-paid green card applications.<sup>137</sup> The international qualifications database shows how some foreign qualifications (per type) compare to Irish qualifications in the NQF (giving the Irish qualification type and the NQF level)<sup>138</sup>.

Also in the **Netherlands**, the administration aims to make the Netherlands an attractive country for skilled workers. To face up to the battle for brains, a regulation for skilled migrants ('Regeling Kennismigranten') was introduced in 2004. The regulation introduced a simplified procedure for recruiting highly skilled migrants that allowed organisations to recruit foreign employees if they would be employed by the organisation and receive an annual gross salary of at least EUR 45,000 or EUR 33,000 if the individual is under 30 years of age. This regulation excludes PhD candidates and post-doctoral and academic professors under the age of 30 who are governed by another legislation. There are no specific target countries or professions identified in the regulations, but several organisations have indicated to be looking for experts in the IT or the medical sector.

The only exception to this 'demand driven approach' is the pilot scheme for Highly Educated Migrants. Under this scheme, students who have obtained master's or PhD degrees (in the Netherlands or abroad) are given a temporary visa without having an employers' offer for a period during which they can search for employment as a highly skilled migrant or to set up an innovative company<sup>139</sup>.

Since the seventies, Germany has had a rather protectionist policy when it comes to the employment of people from outside the EU. This has been progressively softened, but remains rather strictly regulated. In **Germany**, as a general rule, low skilled and low qualified professions, including professions which require basic vocational qualifications are not open for migrants from countries outside the EU (a few exceptions exist). For the vast majority of qualified and highly qualified positions, applicants from outside the EU have to go through an approval process through which the employment authority identifies whether suitable national employees are not susceptible of taking up the position. Only after the approval procedure, can a person be granted a residence permit to pursue employment. The 2009 legislation stipulates that *skilled workers who hold a foreign university degree which is recognised or comparable to a German university degree as well as skilled workers who hold a qualification which is comparable to a recognised foreign university degree majoring in the field of information and communications technology (ICT) can be granted a residence title in*

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<sup>136</sup> Quinn (2010)

<sup>137</sup> Quinn (2010) p.31.

<sup>138</sup> Irish International Qualifications Database

<sup>139</sup> IND Information and Analysis Centre (2010)

order to pursue employment.<sup>140</sup> Highly qualified persons who have an employment offer with a minimum of EUR 64,800 do not have to go through the approval process and are guaranteed the right to permanent residence<sup>141</sup>.

Overall, it appears that *it is basically up to the respective employer to examine whether a foreign applicant is suitable for a certain job. The employer himself must ensure that a foreign applicant meets the requirements of his business in terms of training, qualifications and language skills.*<sup>142</sup> A database which compares foreign higher education qualifications with German higher education qualifications has been developed to support the recognition process<sup>143</sup>.

However, evidence exists which shows that having one's foreign vocational qualifications recognised in Germany is in practice very complex (see below). It is planned that improvements to the recognition of vocational qualifications should be made in the near future<sup>144</sup>.

**Italy** has agreements with several Mediterranean countries (Moldova, Egypt, and Morocco) which put in place a mechanism to facilitate skills matching of migrant workers and Italian employers by, among other things, providing training in the country of origin. For example, the agreement with Moldova is based on the following protocol<sup>145</sup> (the process used with Morocco is very similar):

- Moldovans seeking employment in Italy must be included *in a specially drawn up list by the Migration Department of the Republic of Moldova and the Authorized Moldovan Employment Agencies*;
- This list contains information on the potential employee including his/her qualifications and knowledge of the Italian language;
- Italian employer may select staff from this list and they may also deliver training to prospective staff while they are still based on Moldova.

### 5.2.3 Implications for the role of qualifications frameworks

Overall the following trends can be extrapolated from the information presented above:

- The vast majority of countries are putting in place some migration policy to attract highly qualified people. In general the category of highly qualified is defined by equivalence with master's and PhD degrees of the country (bachelor degrees are also concerned in Australia or UK).  
Consequently, there is a need for having a common understanding of the level of qualifications even though countries that consider qualifications other than academic ones are rare.
- Overall, there are three types of situations (concerning non-regulated professions):
  - Countries where a certain minimum level of qualifications is required (in the UK formulated in terms of NQF level) and subsequently the qualification is taken into consideration during the process of delivering a work/ residence permit;
  - Countries where it is the decision of the employer that matters (demand- driven approach). The candidate has to have an employment offer and in some countries this is matched with a related minimum salary level (it is assumed that employers will only be willing to pay relatively high wages to those who have high qualifications).
  - Countries using a general quota system where the qualification is not particularly taken into account.

<sup>140</sup> Parusel Bernd and Schneider Jan (2010 b)

<sup>141</sup> Questions and Answers on the employment of foreign workers in Germany

<sup>142</sup> Parusel Bernd and Schneider Jan (2010 b)

<sup>143</sup> Anabin database

<sup>144</sup> Idem

<sup>145</sup> IDOS Centre of Study and Research (2010)

- In situations where formal procedures for the recognition of qualifications are taken into account, these appear to be related to both the level of the qualification as well as the skills match between the job requirement and the candidates competences. Formal qualification recognition is also required when the profession of the applicant is regulated in the host country however, in the EU, there are few countries where non-EEA nationals have access to such recognition process.
- In countries where the decision depends on employers' choice, it is likely that employers do not possess sufficient information to assess the qualifications of applicants appropriately unless these are coming from 'well known countries or institutions'. There is evidence that employers have difficulties in assessing the suitability of vocational qualifications (see next section).

### 5.3 EU and international policy framework for qualification recognition of mobile persons

The difficulties of qualification recognition in a transnational context are related to the fact that, due to lack of contextual information or sufficient detail, the signalling function of qualifications becomes ineffective. Effective qualification recognition requires that the signal is 'transmitted'. Hence, a recognition process should involve tools that support such transmission. At the European but also international level (supported by the Council of Europe and UNESCO), several efforts have been implemented for over a decade now to support the recognition process. These are briefly described below.

The way in which the European meta-qualifications frameworks are expected to support qualification recognition was already described in Section 2. One key development in the process of EQF implementation is the design of an EQF online portal a first version of which is already operational<sup>146</sup>. The portal shows in a visual manner how NQFs from European countries refer to the EQF levels. It shows the level to level relationship between the frameworks but it also contains information about the typical qualifications of a given country at each level. For example it shows that the Irish level six is equivalent to the level five of the EQF and that examples of typical qualifications at the Irish level 6 are Advanced Certificate or Higher Certificate.

The development of a network of NARICs (National Academic Recognition Information Centres) has been supported by the European Commission since the mid-eighties as part of the Lifelong Learning Programme (and its predecessors). Their role is to support the recognition of higher education qualifications and periods of studies in view of further studies<sup>147</sup>. Following the signatures of the Lisbon Convention (see below), the Council of Europe and UNESCO developed a network of ENICs (European Network of Information Centres). To facilitate recognition, these centres provide information about qualifications and qualifications structures in their own country and act as a 'gateway' for those who require recognition (they are often not themselves directly in charge of recognition though this depends on the national set up). Like NARICs, their primary role is recognition in view of further studies (not for employment purposes). Though their remit theoretically concerns qualifications in general, in practice they are mostly associated with academic recognition. In the EU countries, ENICs and NARICs are often a single entity. In some countries the ENIC/NARIC centre is integrated into a structure that is in charge of deciding about or giving advice on qualifications recognition for all purposes. In Ireland, for example, the function of qualifications recognition is located within the National Qualifications Authority. This unit issues statements about how foreign qualifications compare to Irish qualifications and advises individuals and employers (it does not recognise professional qualifications this is the task of dedicated competent authorities)<sup>148</sup>. Similarly in Denmark, the ENIC/NARIC centre is set within the Danish Agency for International Education which is in charge of academic recognition that higher education institutions have to use as basis for admission

<sup>146</sup> EQF Portal web-site

<sup>147</sup> ENIC/NARIC networks web-site

<sup>148</sup> Qualifications Recognition (Ireland)

decisions as well as recognition for employment purposes not related to regulated professions<sup>149</sup>. In many other EU countries such centralised structures in charge of qualifications recognition do not exist. Higher education institutions may contact the ENIC/NARIC centre but they do not have to do so. For example, a recent survey of higher education institutions showed that these rarely use the services of ENIC/NARIC or other support tools available, that could underpin their recognition decision (such as international databases)<sup>150</sup>.

The so called Lisbon Recognition Convention (the Convention on the Recognition of Qualifications concerning Higher Education in the European Region)<sup>151</sup> entered into force in 1999 and has been signed and ratified by 51 countries (including some which are not members of the Council of Europe, such as Australia). As said earlier, the Convention sets certain basic principles for fair recognition of qualifications and periods of studies in view of access to further studies or in view of gaining academic qualification recognition. The core idea is that qualifications which grant access to a certain level of higher education programme in one country should be recognised as giving access to the same type of programme in another country and that a refusal of qualification recognition should be conditioned by substantial differences in qualifications.

The implementation of the Lisbon Recognition Convention is supported among other things by Criteria and Procedures for the Assessment of Foreign Qualifications (first published in 2002 and revised in 2010). The revised version of these criteria and procedures advises credentials evaluators to take into consideration the NQF level of the qualification as well as the EQF or other qualifications framework<sup>152</sup>:

*The assessment of a foreign qualification should identify the qualification in the system of the country in which recognition is sought which is most comparable to the foreign qualification, taking into account the purpose for which recognition is sought. In the case of a qualification belonging to a foreign system of education, the assessment should take into account its relative position and function compared to other qualifications in the same system. **Where available, the competent recognition authorities should also refer to the National Qualifications Framework, European Qualifications Frameworks and other similar qualification frameworks as part of the assessment process.***

Work is currently ongoing to prepare an additional guidance document about how NQFs can support the recognition of qualifications, but this relates to the recognition of qualifications for learning purposes only.

## A few words about the concept of substantial difference in qualifications

The Council of Europe publication entitled *Developing attitudes to recognition: substantial differences in an age of globalisation*<sup>153</sup> discusses the concept of substantial change based on these five characteristics of a qualification: level, workload, quality, profile and learning outcomes.

With regard to qualification level, this is considered as a first step in considering qualification recognition. A difference in level can be considered as a substantial difference even though this raises the question of how to consider qualifications that are 'intermediary' (for example short cycle and first cycle qualifications).

With regard to qualifications frameworks, the same publication notes<sup>154</sup>: *The concept of a qualifications framework is relevant to the considerations of substantial differences*

<sup>149</sup> Danish Agency for International Education: Danish recognition system

<sup>150</sup> Polish Ministry of Science and Higher Education (2011)

<sup>151</sup> Council of Europe web-site

<sup>152</sup> UNESCO and Council of Europe (2010)

<sup>153</sup> Hunt E. Stephen and Bergan Sjur (2009)

<sup>154</sup> Idem. p. 23

*because it provides a framework for the comparison of qualifications across the borders of an education system. If a given education system describes a qualification as a first cycle degree ... that gives a strong indication that other countries should recognise this qualification as a first cycle degree. If they do not want to give such recognition, they would need to justify their position by demonstrating a substantial difference ....*

The above citation shows that the way the concept of substantial difference is expected to operate is based on:

- Trust in the information provided by the country;
- Fairness and transparency of the rationale based on which a qualification is not recognised at the same level as in the sending country.

The use of Europass<sup>155</sup> documents brought a standardised manner of presenting qualifications and provides mobile persons with a document about their qualifications in a widely spoken language. These are namely the:

- Europass Diploma Supplement, which is a document provided by higher education institutions presenting in English, or another widely spoken language, the qualification and the content of a programme, followed by the qualification holder; and
- Europass Certificate Supplement, which is provided by the National Europass Centre and presents (in English or another widely spoken language) the content and nature of the VET qualification that a person holds;

The Europass Diploma Supplement is a rather well known document by those in charge of qualification recognition<sup>156</sup>, even though they are considered to be particularly useful for educational transnational mobility<sup>157</sup>.

These developments in Europe are also being reflected upon and used as inspiration outside Europe. An example is the discussion of the European process for qualification recognition and recommendations drawn from it in the Australian Department of Education, Employment and Workplace Relations paper on *Recognition of Higher Education Qualifications across the Brisbane Communiqué Region*<sup>158</sup>.

In parallel to these developments driven predominantly by the education sector, actions to support qualification recognition have also been supported as part of the development of a single market development and free movement of persons within the EU. The European Directive 2005/36/EC<sup>159</sup> on the recognition of professional qualifications unified several EU legislations on qualification recognition, in the context of regulated professions, into a single framework which gives European nationals the right to have their qualifications recognised under certain conditions. It is based on three main regimes: automatic recognition for a small selection of professions where certain minimum qualification requirements have been harmonised, recognition based on professional experience for most qualifications in the area of crafts and a general regime that applies to the other qualifications and is also based on the principle that for refusal, significant difference has to be proven. This form of recognition results in the possibility of practicing a profession which is conditioned by the fact of having certain required qualifications.

There is also growing interest in qualification recognition from the side of institutions governing EU-level migration policies. The topic of economic immigration from outside the EU towards the EU, has been on the agenda of the EU institutions for over a decade now<sup>160</sup>. The underpinning idea is that the EU needs regulated and targeted migration to complete

<sup>155</sup> Europass web-site

<sup>156</sup> an earlier version existed before the Europass portfolio approach was adopted

<sup>157</sup> ECOTEC (2008)

<sup>158</sup> Australian Department of Education, Employment and Workplace Relations (2008)

<sup>159</sup> European Commission, Internal Market web-site

<sup>160</sup> European Commission, Home affairs web-site

certain vacancies and support economic growth. These vacancies can vary from seasonal workers to highly qualified persons. The need for qualification recognition in this context has been underlined on several occasions. The European Commission Communication on the common agenda for integration framework invites Member States to explore new ways to recognise migrants' qualifications<sup>161</sup>. The first and second *Handbook on Integration for policy-makers and practitioners*<sup>162</sup> contain sections on qualification recognition. These documents are developed as an element of the cooperation and exchange of good practice among countries and stakeholders in the area of migration and aim to promote mutual learning among EU countries. Finally, the European Commission is increasingly encouraging qualification recognition of migrants returning to countries of origin as an element of ensuring that circular migration and brain circulation support the development of countries of origin<sup>163</sup>.

The text above shows that, complementing and reinforcing the national initiatives, the issue of qualification recognition is being tackled at the European level from several angles:

- Academic recognition (mainly for purposes of further studies);
- Recognition in the framework of regulated professions as part of single market measures and free movement of persons; and
- Development of the common EU immigration policy.

As will be discussed in the Sections 6 and 7, there is a role that qualifications frameworks are or could (and are likely to) play in these contexts, but they need to be seen as part of the puzzle rather than as a universal solution.

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<sup>161</sup> European Commission (2005 a)

<sup>162</sup> European Commission, DG JLS (2007)

<sup>163</sup> European Commission (2005 b)

## 6 What works well and what are the current obstacles with qualification recognition

This section summarises information from the interviews with professionals engaged in the recognition process in the seven EU countries. It is complemented with information from current literature and based on text analysis of interview write ups. A synthesis of options expressed in the EU interviews is presented in a table format in Annex 2. The results of EU interviews are discussed first and this is followed by a summary of the Australian interviews.

### 6.1 European point of view

#### 6.1.1 Qualification recognition for the purpose of continuing further studies

In general, interviewees considered that academic recognition of higher education qualifications was operating relatively well within the European higher education area and also worldwide. Persons interviewed noted that the use of common structures for qualifications systems in higher education introduced by the Bologna process was especially helpful in this regard. The fact that information on higher education qualifications systems from other countries was generally available, was underlined as useful. The positive role of ENIC/NARIC centres that provide useful resources and expertise was also noted. Several interviewees stated that qualification recognition in this area is based on an appreciation of what a particular qualification enables for in the home system (such as access to first cycle programmes or access to second cycle programmes).

Interviewees from those countries which have a strong international presence in providing higher education felt in general that their systems were well understood and appreciated, while those from countries with less incoming mobility felt that they needed to make efforts to promote an appropriate understanding of the qualifications they provide.

### Additional evidence from literature

Higher education institutions (and in particular universities) have come a long way in 'professionalising' their internationalisation activities, and in particular the admission of foreign students, over the last two decades. This means that they are less and less often relying on central services such as those provided by ENIC/NARICs when making their decisions about the recognition of foreign qualifications for further studies - simply because they are more familiar with the procedures themselves:

The 2006 evaluation of the Danish Centre for Assessment of Foreign Qualifications noted<sup>164</sup>:

*In most cases [higher education] institutions do not require an assessment from CIRIUS to admit a person with foreign qualifications.*

For the same evaluation, a statement from an interviewee from the Ministry of Technology and Science was presented as follows:

*In his mind we were approaching a transition period in credential evaluation and recognition of foreign higher education. His vision was that central recognition services would soon be redundant. In ten years time the Danish system of Higher Education .. By then they would also have the capacity and the motivation to handle academic recognition...*

However, several interviewees also pointed to difficulties in this area. According to their opinions, it is possible that the obstacles in the area of higher education qualifications recognition could be underestimated. The obstacles encountered can be summarised as follows:

<sup>164</sup> Nordic Recognition and Information Centres Network (2006)

- Recognition of professional higher education qualifications, such as professional bachelor degrees, can be problematic in countries where no equivalent qualifications exist (i.e. where only academic bachelor degrees are in place). The fact that a qualification of an equivalent type does not exist in the host country can be used as a reason for refusal of recognition (it is for example embedded in Greek legislation that professional bachelor degrees cannot be recognised in Greece). This also affects the attractiveness of these pathways for foreign students - it can be difficult to explain what is the specificity of these qualifications to persons who have no equivalent types of qualifications in their own systems that might provide a reference point.
- The fact that in some qualifications systems (e.g. Ireland), bachelor degrees (ordinary and honours bachelor degrees) are placed at different levels, may also be confusing and can lead to a low evaluation of foreign professional bachelor degrees.
- The lack of coherence in recognition practices within a country was also noted. The fact that higher education institutions have autonomy in ensuring recognition can lead to discrepancies in the recognition of the equivalent or the same qualifications. Differences can even be found within an institution where different staff members may use different standards. It was indicated that although international agreements exist, these were not necessarily communicated to the persons in the institutions in charge of recognition and that related guidelines were sometimes not known.
- Some interviewees mentioned that the differences in the typical duration of programmes (e.g. one or two years master's degrees) were also an obstacle for recognition. It was also pointed out that it was sometimes very difficult to explain the nature of masters qualifications prepared through long programmes without passing through a stage providing a bachelor degree qualification. Though in European documents the concept of student workload<sup>165</sup> is used to measure the 'size' of a qualification in higher education, most interviewees simply referred to the number of years of duration of a typical programme.

### Additional evidence from literature

The German Social Survey<sup>166</sup> of students, analyses among other things, the qualification recognition of foreign students coming to Germany. It showed that of those persons who came to Germany with a previous first cycle degree:

- 40% were granted recognition at the same level (as a completed bachelor degree);
- 13% were granted an even higher recognition; but
- 21% were given no equivalency and were only granted access to higher education (no qualification recognition or credit for exemption).

Thirty two percent of individuals with a first cycle degree noted that they were dissatisfied or very dissatisfied with the recognition granted to them. The recognition of post-graduate degrees appears better.

A Polish survey<sup>167</sup> of higher education institutions on foreign qualification recognition illustrates the difficulties of ensuring a coherent and consistent approach to recognition across a country. The survey results pointed out aspects related to the lack of application

<sup>165</sup> Workload indicates the time students typically need to complete all learning activities (such as lectures, seminars, projects, practical work, self-study and examinations) required to achieve the expected learning outcomes. European Commission DG Education and Training (2009)

<sup>166</sup> HIS Hochschul-Informations-System (2011)

<sup>167</sup> Polish Ministry of Science and Higher Education (2011)

of existing rules or guidelines by HEIs:

- *In some cases HEIs do not apply relevant regulations on recognition.*
- *The provisions of the Code of Administrative Procedure as well as the good recognition practice are not always applied while following the recognition proceedings.*
- *The survey revealed some improprieties in conducting the recognition process. Some HEIs do not inform applicants about the right of appeal against the resolutions made during the recognition process or the recognition process itself. Moreover, the applicants are not always informed in writing about the necessity of applying compensatory measures.*
- *HEIs sometimes take the nationality of the applicant into account, while it is only important which educational system the issuing institution belongs to.*

Most interviewees felt that achieving an accurate understanding of vocational qualifications was much more complex than in the area of higher education. The complexity and variety of vocational qualifications were frequently mentioned as an obstacle. Given that the recognition of qualifications typically encompasses comparing a foreign qualification to the home system, the diversity of qualifications systems was considered as a challenge. It was also stated that internally, within a country, the relationships between VET qualifications were not necessarily clear and to expect foreign students to understand the system was asking too much.

The lack of a network equivalent to ENIC/NARIC centres, which would provide information about VET qualifications to those requesting this information from abroad, was also highlighted as a problem.

Finally, several interviewees highlighted the fact that VET qualifications were in fact sometimes of a different nature (e.g. work-based or school-based) and they did not feel that the qualifications gained through these different pathways were necessarily equivalent to each other.

In more general terms, it was stated that there is a lack of transparent information to prospective applicants about how qualifications will be recognised and what the process is; the quality assurance measures for the process of qualification recognition are not always clear<sup>168</sup>.

### 6.1.2 Qualification recognition for labour market purpose

When responding to questions about qualification recognition for labour market purposes, interviewees naturally distinguished between informal recognition by the actors on the labour market and formal recognition which is related either to the possibility to get a certain type of visa, work permit or the option to practice a certain specific profession (in case of regulated professions). Though EU interviewees were asked to reflect on the situation of non-EEA persons, they did not systematically make this distinction. However, this section only refers to the information concerning mobile non-EEA workers.

In general, interviewees outlined the absence of a coherent framework for qualification recognition of mobile persons from outside the EEA. The few cases where such procedures exist, are procedures for highly qualified persons in the framework of residence permits for this category of migrants (when the category exists). One interviewee mentioned the Danish regulation on Assessment of Foreign Qualifications (see box below) as a positive example.

<sup>168</sup> An example of a discussion on quality assurance for qualifications recognition measures can be found in the evaluation of the Danish recognition services but based on interviews feedback such measures appear to be rare. See Nordic Recognition and Information Centres Network (2006)

Interviewees mentioned the negative effects of the lack of qualification recognition in terms of 'brain waste', but others also pointed out issues of unequal treatment between different groups of migrants.

## Examples

### Danish Act on the Assessment of Foreign Qualifications<sup>169</sup>

The legislation from 2001 creates a coherent framework for foreign qualification (and periods of study) recognition in Denmark, be it for labour market or academic purposes. The Act gives all foreigners the right to undergo a qualifications recognition procedure and it distinguishes between two main cases:

- An assessment of the level of foreign qualifications compared to the levels of the Danish qualification system; or
- An assessment of foreign qualifications and study periods in relation to particular Danish qualifications.

It also gives applicants the right to appeal.

### Recognition of foreign qualifications in Ireland

Ireland<sup>170</sup> has set up a single contact point for qualification recognition within the National Qualifications Authority (NQA); this replaced a situation where a multiplicity of actors were involved in qualification recognition<sup>171</sup>.

The NQA has made explicit the phases of the recognition process: from information to applicants, through referral, assessment of the qualification until the fees, speed of procedures and the right to appeal. This results in the NQA issuing a comparability statement that shows how the foreign qualification compares to a qualification in the Irish NQF.

When it comes to the informal recognition of qualifications by employers, several interviewees underlined that:

- In general, employers do not understand foreign qualifications and hence cannot adequately appreciate them; and
- Only large multinational firms have the capacity to recognise foreign qualifications as they have the capacity and dedicated expertise needed to do so.

Even where qualification recognition services exist, employers are often not sufficiently aware of them. On the other hand, interviewees highlighted the usefulness of online databases with foreign qualifications or foreign qualifications systems descriptions, for employers as well as those in charge of formal recognition.

## Further evidence from literature

The German study entitled 'Brain Waste'<sup>172</sup> showed that:

- There were important institutional barriers for the qualification recognition of migrants in particular, linked to the multiplicity and complexity of structures dealing with recognition;

<sup>169</sup> Translation of Consolidation Act no. 371 of 13 April 2007 (Danish Act in effect) Assessment of Foreign Qualifications etc. (Consolidation) Act

<sup>170</sup> The National Qualifications Authority of Ireland (2004)

<sup>171</sup> Idem – see Annex 1

<sup>172</sup> Englmann Bettina and Müller Martina (2007)

- There was little transparency of decisions and little data was available for analysis;
- Migrants did not have adequate information about the options for qualification recognition;
- The awareness of the employers and placement officers of migrants skills could be improved substantially.

An Irish report<sup>173</sup> on the labour market integration of migrants underlined the inability of employers to evaluate non-Irish qualifications and their lack of willingness to accept foreign credentials. The report discusses the contribution of the National Qualifications Authority of Ireland to provide qualification recognition and a more detailed explanation of foreign qualifications, but it also notes that:

*the NQAI has made a great contribution to promoting foreign qualifications in Ireland ....Despite their valuable service a number of non-Irish nationals were still unable to find work even when disclosing this statement. This can be ascribed to the lack of awareness or apparent understanding of the National Framework of Qualification by employers and also the lack of work experience in Ireland.*

The report identifies the use of the English language as one of the obstacles to accessing positions adequate to one's qualifications. However, it also notes that while migrants improve their English language over time, their labour market situation seems not to adjust.

### 6.1.3 What aspects matter for qualification recognition

Interviewees noted a range of characteristics of qualifications that matter for qualification recognition. These are broadly in line with those cited in the Council of Europe<sup>174</sup> report on substantial differences in the - level, workload, quality, profile and learning outcomes. The following points were made by the EU interviewees.

- Qualification level is considered only as a starting point. Interviewees mentioned that it was considered as important to see how a qualification compared to the national levels of the host country. The position in a meta-framework, such as the EQF or the Bologna Framework, was less important.
- The workload of typical studies is generally expressed in years and not in terms of notional learning hours or credit points, even though programme duration may vary depending on programme intensity.
- The type of qualification is important, especially when there are several qualification types at the same level in the qualifications system. In some countries where the concept of qualification type is not commonly used, the interviewees referred to the type of awarding institution. It can be assumed that awarding institutions of different types, award different types of degrees (for example, an academic or professional bachelor degree), even though it is possible that under this concept the interviewees referred to the status of the institution (accredited or not), rather than type.
- The qualification content. It seems that there is not yet a common understanding of how this should be interpreted. Some interviewees referred to the education and training inputs, others to the learning outcomes (and the quality of their descriptions) and others referred more generally to the activities and professions the qualification prepared for. Generally speaking, the answer to the question, 'what does the qualification allow the holder to do in the home country', matters.

Finally, several interviewees noted that only those qualifications that are nationally recognised are recognised when the person goes abroad. The fact that a qualification is nationally recognised can take different forms; the qualification is accredited by a national authority, it is represented in a national qualifications database or register, or the diploma

<sup>173</sup> Slovák (2009)

<sup>174</sup> Hunt E. Stephen and Bergan Sjur (2009)

bears a mention that it was awarded under the authority of a national institution (for example a Ministry).

## Further evidence from literature

The Polish HEIs survey regarding the recognition practices found that<sup>175</sup>:

*The majority of the HEIs that took part in the survey apply input criteria such as: content and duration of a program. Output criteria such as learning outcomes are more seldom used.*

*The decision on recognising or not recognising a foreign documents is made by HEIs mainly on the basis of documents submitted by the applicant, those are: a degree document, diploma supplement /transcript. In many cases a recognition statement issued by the Polish ENRIC/NARIC is also taken into account (actually this was indicated as the third most important source of information).*

*HEIs rarely use international databases of systems of education, websites of ministries of education, accrediting organizations or ENRIC/NARIC centres, which, in some cases may result in a lack of information on the status of the institution that issued the diploma or provided the course.*

The evaluation of the Norwegian ENIC/NARIC centre from 2005 highlighted an interesting aspect about the role of persons in charge of qualification recognition. It discusses the need for qualification recognition to remain a pragmatic and 'client oriented' service in the following manner<sup>176</sup>:

*Detailed information on specific aspects of a particular foreign degree was hardly ever needed. From the evaluation team point of view recognition work contains an inherent risk of being too specific and detailed. Country specific knowledge should be obtained in order to qualify case processing rather than for its own sake.*

*The evaluation team sees a dichotomy between the staff's wish to enhance the unit's expert role and delivering value for money to the individual applicant and society... The evaluation team recommends the unit broadens its focus from being an organisation of experts to that of an information and service organisation, which caters to the needs of individual and institutional users.*

## 6.2 Australian point of view

The Australian experience indicates that qualifications recognition is enhanced when it is firmly rooted in national policy, implemented within a coherent strategy and supported by appropriate tools and instruments.

The recognition of qualifications is an important policy area in Australia; it contributes significantly to the smooth operation of immigration programmes and to national and institutional efforts to develop the participation by overseas students in Australian education courses. The importance of qualifications recognition is reflected in the positioning and status of the National Office of Overseas Skills Recognition (NOOSR) as a key measure in the agenda of Australian Education International (AEI), the lead organisation in Australian international education policy, regulation and government-to-government engagement. All interviewees referred to the significance of NOOSR in relation to mobility.

However, AEI-NOOSR is not the only organisation involved in qualifications recognition in Australia. Front-line assessment of foreign qualifications is undertaken by the receiving education institutions (i.e. admissions officers) in relation to incoming students, and by a range of designated assessing bodies (e.g. Trades Recognition Australia, professional bodies) in relation to worker immigrants. Assessment of immigrants' qualifications is related to the immigration points system. Although there are many organisations involved, the resulting process is coherent and consistent as all organisations operate within the same

<sup>175</sup> Polish Ministry of Science and Higher Education (2011)

<sup>176</sup> Nordic Recognition and Information Centres Network (2005)

legislative guidelines (e.g. in relation to immigration) and use the same tools and instruments to identify and assess qualifications.

The main local instruments for supporting the assessment of foreign qualifications are the Australian Qualifications Framework (as a benchmark) and the Country Education Profiles (as an information bank). The profiles (CEPs) have been developed and maintained by AEI-NOOSR over many years. They comprise a range of fiches analysing the education systems of over 120 countries and the comparability of their qualifications with Australian qualifications. CEPs contain information about the structure and qualifications of all sectors of a country's education system, key points of comparison used by AEI-NOOSR for assessment purposes (e.g. quality indicators), and assessment guidelines for comparing qualifications from the overseas country with qualifications on the AQF. The CEPs are used to inform decisions for a wide variety of purposes including admission to an educational institution; employment; migration; and registration with a professional or regulatory body. CEPs are widely used by education institutions, professional bodies, government departments, migration agents, employers, and individuals both in Australia and overseas. There are 7000 users of the CEPs in Australia and 1000 offshore.

Other National Qualifications Frameworks are also considered to be useful tools, providing information that can be interpreted against the AQF. Other useful instruments on the international scene are diploma supplements and information capsules such as Europass.

The Australian perspective is that qualifications recognition is essentially a complex process requiring experience and expertise.

### 6.2.1 Obstacles and issues

In consultations undertaken in the course of this study, some issues were identified that could become obstacles to the further improvement of qualifications recognition processes:

- National and transnational qualifications frameworks are useful tools for recognition, but not as an automatic recognition mechanism;
- The level of a qualification in a framework is useful information, but it is of limited value unless there is also clear and trustworthy information about quality. This relates to the quality assurance of qualifications, but also to the credibility of the awarding body, the status of framework authorities and, where relevant, the reliability of referencing to transnational qualifications frameworks;
- The rapid development of new types of qualifications is challenging for recognition processes – e.g. unit-based awards, 'cross-over' awards with elements of HE and VET, portfolio awards that contain amalgams of national awards of different sizes and professional awards.

A general concern is that there may be unrealistic expectations about the use of transnational qualifications frameworks in qualifications recognition. It is noted that EQF is being developed in exceptional circumstances, among countries that already have significant relationships and under the aegis of a strong coordinating body (the European Commission).

## 6.3 Sectoral or professional agreements

When discussing qualification recognition there is an important role for international sectoral or professional agreements. These enable, between several countries, nearly automatic recognition of certain qualifications linked to a specific profession. These agreements usually exist in strongly regulated professions where the regulation is transnational and hence qualifications in different countries are controlled in a precise and common way – the qualifications subjected to this regulation may indeed be seen as equivalent in many ways. A typical example of this form of agreements exists in the aviation or maritime sectors. In the aviation sector, the qualifications for aircraft maintenance are harmonised and are, in effect, the accreditation of a person's competence by a transnational body (more specifically its

national branches/contact points). This enables professionals to practice their profession not only in their own country but also worldwide<sup>177</sup>.

Another example concerns engineering qualifications. Several international networks of (national) engineering organisations exist and within the network there is agreement on the mutual recognition of qualifications among members. The recognition in these networks can be based on different principles. For example, the European Federation of National Engineering Associations is a member of the European Network for Accreditation of Engineering Education which accredits existing programmes and qualifications. This accreditation is based on shared framework standards that specify the learning outcomes expected. A different set of principles applies when the agreement is not explicitly based on common standards but is based on the mutual recognition of qualifications among signatories of agreements governed by the International Engineering Alliance. In this latter case, trust is based in the quality and relevance of qualifications governed by each of the separate engineering associations.

An international system of qualifications exists for different occupations concerning welding professionals<sup>178</sup>. The European Federation for Welding, Joining and Cutting has a long tradition of reflection and guidelines in the area of requirements for welding professions. Under the auspices of this organisation together with the International Institute for Welding, a system of internationally recognised qualifications is in place for several years. It is based on:

- Five sets of education, examination and qualification guidelines for five professional qualifications;
- A system through which an authorised national body is nominated in each participating country supervising the implementation of these guidelines;
- A body of implementation guidelines; and
- An authoritative corps of top level experts working on defining and reviewing the guidelines.

Thirty one countries (within the EU but also outside) are members of this organisation<sup>179</sup>.

These international sectoral arrangements are often based on following characteristics:

- Harmonisation of education and/ assessment standards and procedures;
- Mutual recognition of national bodies in charge of the implementation of the international standards;
- Possibly also harmonised requirements about who can administer assessment (what is their profile) and who can deliver preparatory training.

They can form a mini-qualifications system of its own (as it is the case in the example of welding).

<sup>177</sup> See for example European Aviation Safety Agency website <http://easa.europa.eu/certification/certification-directorate.php>

<sup>178</sup> Quintino Luisa and Ferraz Rute (2009)

<sup>179</sup> European Welding Federation: <http://www.ewf.be/membersMembers.aspx>

## 7 The value of qualifications frameworks to support mobility

Professionals engaged in the recognition process were asked to judge the potential and limitations of qualifications frameworks in supporting mobility through better qualification recognition. This section synthesises their views and then presents a summary of the potential and limitations of qualifications frameworks in supporting the mobility of workers and students.

### 7.1 Interviewees' opinions

Most interviewees had positive expectations of qualifications frameworks in supporting mobility through better qualification recognition. In particular, interviewees highlighted that qualifications frameworks will bring improved transparency and legibility of qualifications systems. These views are in line with the theoretical expectations of qualifications frameworks as expressed in a range of policy documents and visions statements for their establishment. In addition to greater transparency interviewees believed that:

- Qualifications frameworks can facilitate recognition of all forms of learning and therefore have the potential to support recognition of work experience and competences achieved through work abroad;
- They can help establish and sustain a network of institutions that will speak the 'same language' and will be able to provide credible descriptions of the full qualification system instead of giving a fragmented view as it remains the case currently;
- They can lead to the development of databases and registers of qualifications (hopefully in a broadly understood language), which if publicly available and supportive of browsing, could be useful for qualification recognition abroad.

In this context, the EU interviewees also positively appreciated the role of the EQF and the referencing of NQFs to the EQF in supporting transparency.

However, a number of limitations or conditions for the potential of frameworks were also identified:

- There was a common belief that the level of a qualification is only a first step in qualification recognition and other dimensions (such as the content of a qualification and its quality assurance processes) are of strong importance and are often more difficult to 'translate' into the national system than the level of the qualification;
- The fact that employers are interested in a brief summary of information about the qualification and not interested in getting too detailed information about the learning outcomes of a given qualification, was also mentioned;
- The fact that in Europe qualifications frameworks are currently in early stages of development in most countries means that time will be needed before the frameworks can be used more generally to support mobility. Interviewees also believed that, for employers in particular, good communication efforts will also be needed before a working understanding of these tools can be developed.

Several interviewees also noted that currently most discussions on qualifications frameworks are oriented at the validation of learning within national systems and the broader issue of the international recognition of foreign qualifications is not receiving attention. Interviewees pointed out that if the international dimension was considered when setting up a qualifications framework, it represents a risk for future foreign qualification recognition. Interviewees thought it was important that certain qualifications (such as those that enable entry to higher education) are placed at levels which ensure internal coherence (within the national system) as well as external coherence with the levels used in other countries. There is already a well established method for the mutual recognition of qualifications giving access to higher education and if these qualifications are placed at levels equivalent to different EQF

levels this would potentially have a negative impact on recognition but also on the credibility of the EQF and NQFs.

A question was also raised about how older qualifications will be included in frameworks as they are likely to be different to current qualifications (for example, they are not likely to be based on learning outcomes).

When it comes to the use of transnational qualifications frameworks and the recognition of qualifications the following points were made by interviewees:

- While referencing to the EQF is useful to get an understanding of the relationship of qualifications systems, it is how a foreign qualification relates to the national systems and framework of the host country that is decisive for qualification recognition. The foreign qualification will be compared to a national qualification and not an EQF level descriptor.
- The usefulness of the NQFs and consequently also the EQF, relies on the credibility and validity of the process through which qualifications are placed at levels. Interviewees noted that if certain key qualifications (such as those used for entry to higher education) were referenced to different EQF levels in different countries, it would undermine the credibility of the EQF;
- The potential for misunderstanding of certain NQF objectives related to the inclusion of other forms of learning in the NQF was also noted. Certain NQFs will cover not only qualifications issued by the formal education and training system, but also (some) qualifications awarded by non-formal learning providers. The fact that certificates issued from non-formal learning will be placed at the same level in the NQF as qualifications from the formal education system, does not mean that the two have equal 'value' or that they have equal national validity and recognition (by the education system as well as by employers).

## 7.2 Summary of the value of qualifications frameworks for supporting recognition

- 1) NQFs give information about qualification level. Level is an important dimension for understanding qualifications. NQFs are a first step in appreciating a foreign qualification abroad – especially for formal recognition. However, level is only one dimension needed for qualification recognition, other aspects are also important.
- 2) Qualifications frameworks can clarify information about other technical dimensions of qualifications such as workload, learning outcomes and type of qualification. These technical dimensions are important for formal recognition. Informal recognition by employers does not require this detailed information and is influenced by aspects such as reputation or familiarity with a system.
- 3) It will take time before frameworks become widely established – this breadth of use is a requirement for their use for recognition.
- 4) There seems to be a willingness to ensure that coherent formal recognition strategies are carried out by designated bodies with clear and transparent procedures and an appeals possibility (for example, Denmark or Ireland). In Australia this procedure is even more strongly linked to immigration. Consequently, qualifications frameworks could have a stronger role to play in bringing coherence to recognition strategies.
- 5) There is likely to be continued growth in the demand for formal as well as informal recognition of foreign qualifications (growing student and workers' mobility). The demand concerns a variety of qualifications systems, types and fields of study and thus requires the use of systematic tools (such as frameworks) for recognition.
- 6) There is a possibility of stronger willingness in the future to link immigration with qualifications recognition thus creating more demand for qualification recognition.

- 7) Greater demand could bring greater familiarity with foreign qualifications, greater development of international databases on comparability of qualifications, and the detailed procedure of qualification recognition may become less used.
- 8) Frameworks will lead to internal clarification of relationships between qualifications, which will have positive effect on the way qualifications from a given system are presented abroad.
- 9) The main reference for recognition is the host country qualification system. Therefore, if no equivalent qualifications exist in the host system (in terms of type or profile), it remains difficult to actually recognise a qualifications as an equivalent to an existing host country qualification.
- 10) If the NQF development process focuses too much on the relationships between qualifications within a country, there is a risk of inconsistencies in positioning of qualifications at a transnational manner. This could be counter-productive.
- 11) Frameworks are closely associated with the existence of databases or registers of qualifications. These are useful tools for qualification recognition. They provide summary information on aspects such as: the content of the qualification, the profession(s) for which it prepares, or the fact that the qualification is nationally recognised.
- 12) To make frameworks become part of the toolbox for qualification recognition, there is a need to communicate to a range of actors in charge including employers and HEIs. Their awareness of and understanding of frameworks cannot be taken for granted.
- 13) There is a need to provide information about qualification recognition possibilities and opportunities to the individuals. This will not be achieved by the frameworks as such. On contrary, there might be a risk of misunderstanding the role of EQF levels, for example by taking them at face value by the individuals
- 14) An important element for qualification recognition is the profession for which a qualification prepares or information about what the qualification enables a person to do in his/her own country. This is not captured by qualifications frameworks even though it can be at least partly reflected in the learning outcomes used and encouraged by the use of frameworks.
- 15) Qualifications frameworks are often underpinned by quality assurance procedures. These can improve trust and hence qualifications recognition. But this can only work if these quality assurance procedures are solid and transparent.
- 16) Qualification recognition is somewhat difficult in the area of vocational or professional qualifications as there is a greater diversity of systems and structures among countries. Qualifications frameworks are expected to improve the legibility of foreign qualifications systems and thus better appreciate these qualifications.

These findings are consistent with the results of work that has been documented as part of the Bologna process working group discussions (see box below). However, they also shed a more critical light on what frameworks can achieve. The findings of this study emphasise the need to, on one hand, develop a coherent set of tools that support the recognition of qualifications and, on the other hand, to ensure that these tools are effectively communicated to the persons concerned: applicants, employers or those in charge of recognition.

## Results of an earlier reflection on the role of qualifications frameworks for recognition

A paper<sup>180</sup> prepared for a seminar on the FQ EHEA in 2005 summarised the potential benefits of qualifications frameworks for recognition as follows:

- Improve the transparency of qualifications, make credential evaluation easier (for HEI and other stakeholders) and judgements more accurate;
- Act as a common language/methodological approach that internationally can improve recognition and understanding between educational systems;
- Facilitate the recognition of prior learning and lifelong learning between states;
- Simplify our understanding and improve the expression of the curriculum between countries through the use of common reference points;
- Facilitate the application of the Lisbon recognition convention and the code for transitional education providers;
- Ease the pressure of work on the ENIC-NARIC network;
- Make ECTS based on learning outcomes and levels more effective;
- Allow HEIs and credential evaluators to move away from imprecise measurement indicators that focus on formal procedures (admissions criteria, length of studies, qualification titles, years/hours of study undertaken) and to focus on the results of student learning. Move from input measurements to output/outcome measurements.

The paper also anticipated the following difficulties:

- Issues with different durations of typical programmes;
- Need for time for the credibility of frameworks to be established.

In conclusion, professionals working in the field of qualifications recognition in the EU believe that qualifications frameworks (national and transnational) have the potential to support the recognition process both in offering initial indications of the value of a foreign qualification in another country, but also in terms of bringing coherence to the complex range of actors, agencies and procedures involved in qualifications recognition. They are also pointing towards conditions under which this added value of qualifications frameworks can be realised and highlighting some existing risks that could negatively affect existing well established practices in qualification recognition. They are also aware of the limitations of using NQFs (and EQF) for qualification recognition. In Australia, the key mechanism linking qualifications with mobility is the recognition service, NOOSR. In this context, the value of the AQF as a tool for supporting recognition is strongly appreciated, but not as an automatic mechanism: it is one of a range of tools used. In interpreting the meaning of foreign qualifications, national qualifications frameworks are considered to be a useful resource, but there is little familiarity with EQF so far. Qualifications professionals in Australia have concerns about trust in relation to the issue of quality assurance of foreign qualifications, but also the issues of credibility of awarding bodies, the status of framework authorities and the reliability of referencing to regional frameworks such as EQF. There is an expectation that these trust issues can be addressed over time.

<sup>180</sup> Adam Stephen (2005)

## 8 Possible linkages between the EQF and the AQF

Considerations so far have focussed on the role of qualifications and qualifications frameworks in supporting or regulating the mobility of students and workers. The evidence has been presented in two parts: the first has set out the reality of mobility, including quantitative analysis of movements and policy positions of governments; the second part has set out the perceptions from experts whose professional roles relate to mobility and recognition of qualifications. This is a strong basis on which to draw conclusions about the possible added value of qualifications frameworks in supporting or regulating mobility.

In Section 7 some conclusions have been described about the potential usefulness of qualifications frameworks to link together to support and regulate mobility. Taking into account the potential for added value discussed earlier, combining it with the evidence of levels of mobility, including barriers to mobility, there is a rationale for exploring possibilities for developing the relationship between the EQF and the AQF. This section discusses the following question: What is the range of possibilities for linking these two qualifications frameworks? A speculative analysis of the possible forms of linkages suggests many options that are presented in Table 8.1.

Table 8.1 Possibilities for linking the EQF and AQF

Possible approach to linkage	Outline
<b>1. Full legal linkage</b>	The AQF links to the EQF in the same way as an NQF from an EU Member State, following the requirements of the EQF Recommendation of 2008 <sup>181</sup> .
<b>2. Mutual recognition</b>	Each framework authority endorses the other in terms of its own framework, meaning that each of them issues a statement which concerns how the other framework relates to the home framework. A common declaration is made.
<b>3. Bilateral declaration</b>	Each framework authority endorses the other in terms of its own framework. Each makes an independent declaration.
<b>4. Unilateral declaration</b>	A framework authority uses evidence to make a statement about linkage to another framework.
<b>5. Promotion and engagement</b>	No formal level-to-level linkage but cooperation at expert level, research and reports, mutual promotion of the other framework. Could lead to a <i>de facto</i> alignment based on custom and practice.
<b>6. Independent review</b>	Research is commissioned from an international body to look at linkage and a report is published
<b>7. Sector by sector linkage</b>	Partial framework links in an education and training sector, for example higher education, VET or general education.
<b>8. Bilateral periodic review</b>	On a periodic basis, authorities cooperate to review the informal relationships between the frameworks.
<b>9. Extended dialogue</b>	Ongoing dialogue between framework leaders on the relationships between the frameworks.
<b>10. Laissez faire</b>	Allow informal linkages to develop.

This speculative analysis indicates that it is possible to look at the level descriptors of two frameworks and aim to make a direct, formal level-to-level 'technical' link between them. However, this arrangement is at one end of a spectrum of arrangements. At the other end of the spectrum is the possibility of a linkage that is based on informal arrangements made by

<sup>181</sup> See the EQF Recommendation here: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:111:0001:0007:EN:PDF> and the EQF referencing criteria here: [http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/criteria\\_en.pdf](http://ec.europa.eu/education/lifelong-learning-policy/doc/eqf/criteria_en.pdf)

individuals, private companies, learning institutions and any other entities that consider a relationship between levels in the two frameworks helpful for them. The table also suggests that it is unlikely that there would be no linkage. Given the importance of the EQF for EU countries and increasingly for other countries and considering that the AQF is a well established and well known framework, someone will find it useful to figure out how the two frameworks relate to each other. In reality, it can already be argued that at the time of writing the following forms of linkages already exist:

- Ireland and Australia have recently completed a research project on the comparison of NQFs<sup>182</sup>; or
- The Danish database on decisions regarding how foreign qualifications compare to Danish qualifications contains nearly 200 records that concern Australian qualifications<sup>183</sup>. The Danish Qualifications Framework has been referenced to the EQF in spring 2011 and some linkages could be deduced from this database.

When moving from one end of the spectrum to another, there are dimensions related to the nature of the linkage that are likely to change:

- The competency of the body that endorses the linkage – this could range from a government or the European Commission (on behalf of Member States) to a single learner;
- The status of the linkage and its ‘authority’ over certain practices;
- The existence (or not) of linkages through other qualification frameworks – for example, prior linkage to FQEHEA, or a relationship between AQF and EQF could be implied through a link between the AQF and a National Framework in an EU Member State (such a link already exists between New Zealand and Ireland);
- The role of systems for academic recognition; all countries have such systems and bodies that make decisions about equivalencies can be powerful shapers of opinion on the relationships between qualifications frameworks;
- The range of education and business sectors involved in a linkage – for example, there could be a linkage only between the higher levels of each framework in terms of the higher education sector covering no other sectors. It might be concluded that the wider the range of sectors that are linked the stronger the overall linkage;
- The role of professional bodies in ‘validating’ linkages. Some bodies use qualifications as a key requirement of professional membership and level of membership. These autonomous bodies, many of which operate internationally, may develop linkages between framework levels independently of any formal endorsement. Their decisions can carry enormous weight in universities and in the labour market;
- The role of international companies and regulators in establishing international qualification levels required for certain jobs and occupations (for example, for aircraft maintenance). These bodies are operating and active in the field of qualifications in the EU as well as in Australia. They effectively draw lines between the levels in the EQF and the AQF.

Theoretically, the possibilities for linking the AQF and the EQF are many. However, *some linkages can be defined and managed by framework authorities and others arise informally and have a dynamic and status of their own*. Citizens will naturally take into account all information available to them on linkage decisions, formal and informal. Therefore, the whole spectrum of dimensions of possible linkages should be considered including the formal authoritative arrangements and the informal arrangements.

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<sup>182</sup> Mernagh Edwin (2010)

<sup>183</sup> Danish database of previous assessments: <http://en.iu.dk/recognition/our-assessments/assessment-database>

Whatever the basis of a useful linkage between frameworks, it is always necessary, for the sake of all users, to *enable the establishment of a zone of trust between the two frameworks where linkages have general support from governments, its agencies, businesses that recruit across boundaries, providers of learning and the range of less formal users of qualifications and levels.*

## 8.2 Pressure for a zone of trust

Qualifications frameworks are developing around the world<sup>184</sup> and this means many countries are now able to look at their qualifications in a relational context that then presents possibilities for transnational comparisons. The rationale for this outward looking stance is likely to be a response to stronger internationalisation of trade, migration flows (inward and outward) and sophisticated global electronic communications networks.

The globalising trend is enhanced by the emergence of a 'frameworks language', in particular the ubiquitous use of learning outcomes as the basis for describing qualifications and the general adoption of an essentially three-stranded set of descriptive factors (knowledge, skills and competence). This development creates both demand and opportunity; for example, with the common use of the same 'framework language' in AQF and EQF circles, it is perhaps inevitable that scholars and other commentators will explore how they relate.

As has been described earlier in this report, the numbers of mobile students and mobile workers are increasing and so is the demand for worldwide recognition of qualifications. Mobility between countries that have no traditional ties is also growing, underlining the importance of systemic tools to improve the understanding of qualifications. All of the countries reviewed in this study are deploying efforts to support the internationalisation of their higher education systems; while internationalisation of VET is less advanced, there are several instances of very significant mobility of VET students. In addition, the vast majority of countries are putting in place some migration policy to attract qualified people. All of these policies depend for their implementation on effective processes for the recognition of foreign qualifications.

It appears that, depending on the country involved, there is a mixture of centralised and decentralised decision making about the recognition of foreign qualifications. The more decentralised the decisions about qualification recognition are, the more likely it is that there will be a variety of approaches as to how qualifications are recognised and the more need there may be for supporting tools and methodologies such as those associated with frameworks. In such contexts, linkages between frameworks may enhance qualifications recognition.

Where there is no formal approach to linking frameworks it is inevitable that there will be unilateral referencing; therefore, it might be the case that a formal approach could eliminate unofficial referencing which could undermine confidence in frameworks generally. It may be that there is a tension between the approaches of the education and training authorities (who 'own' and manage qualifications systems) and labour market stakeholders (companies, agencies, recruiters, etc. that use qualifications systems and effectively validate the relativities established by the education authorities). The framework 'owners' may prefer to have formal alignments with other national or international structures, whereas the labour market may prefer less formal understandings that emerge from practice.

## 8.3 What parameters could define the relationship between EQF and AQF?

Before considering the added value of establishing a relationship between EQF and AQF, it is necessary to examine the feasibility of such an initiative. How similar are these frameworks? In what ways do they differ? A comparison between EQF and AQF was undertaken as part of the preparation for an EU/Australia policy dialogue in late 2010. The

<sup>184</sup> The ETF suggest there may be as many as 200 by the end of 2011. In 2004 there were less than 10.

results of this comparison can be examined in Section 2. It indicates considerable similarities and differences between the two frameworks which are also summarised here.

### 8.3.1 The main similarities

- The frameworks are structures of levels defined in terms of learning outcomes;
- Three categories of learning outcomes are used and the two frameworks use similar taxonomies;
- The outcomes for a given level build on and subsume the outcomes for the levels beneath;
- Neither framework has an in-built credit mechanism;
- Both frameworks are neutral as to field of learning or mode of learning;
- Both frameworks are comprehensive, designed to recognise learning achieved in all sectors including non-formal and informal learning, on a lifelong learning basis.

### 8.3.2 The main differences

- The AQF relates to one country (albeit with a federal government and Commonwealth of States); the EQF relates to many countries with very different governing arrangements, different education traditions and different languages.
- The AQF is a framework to which Australian qualifications are directly related; EQF is a meta-framework to which national systems can be referenced – no qualifications are directly referenced to EQF.
- The AQF defines qualifications types, whereas EQF does not refer to qualifications.
- The AQF defines the volume of learning outcomes associated with qualifications types, the EQF has no volume metric.

This amounts to a very significant degree of correspondence between EQF and AQF in terms of their underlying conceptual basis, definitions of terminology and general approaches to the recognition of learning achievement. However, this commonality should not suggest that the two frameworks can sit side-by-side. When we look at the context in which they are used we see some further major differences that must be taken into account when the added value of developing a relationship between these frameworks is considered.

The uses of the two frameworks are fundamentally different and are a response to the national and international settings in which they have been developed. For example, AQF and EQF differ significantly in the way they interact with their respective labour markets. The EQF relates to a single labour market in a group of countries where there is free migration; it creates a transparency between qualifications systems and thus aims to foster mobility. The AQF by contrast relates to a labour market where controlled recruitment from abroad is the norm. Immigration policy is designed to facilitate the Australian economy, so immigrants are selected on the basis of their skills and experience. Qualifications recognition is an active and crucial element in the Australian immigration process and the significance of qualifications is set to increase with recent developments to the system. AQF is a key tool in qualifications recognition.

There is also a difference in the ways the quality of qualifications is assured in Australia and in EU Member States as a result of the setting for the frameworks. In the case of the Australian qualifications framework, there is limited need for an extensive quality assurance system that operates at the level of the framework since the qualifications themselves are regulated at the level of the sector of their application. In Europe the national systems vary considerably in terms of the focus of quality assurance and it is necessary to have tools for

making these systems more comparable<sup>185</sup>. In Australia there is a need for additional information and checks on the quality of qualifications when these qualifications come from outside the country<sup>186</sup>. The AQF plays an important but limited role in this process.

In Europe the EQF is not the main point of reference for citizens; the first point of reference is the national qualifications framework. However, as the EQF becomes more deeply embedded, it will become more important for citizens who on the move across national boundaries. The AQF is the National Qualifications Framework for Australia, and thus corresponds to an NQF in a Member State rather than to the EQF.

#### 8.4 The added value of establishing a link between EQF and AQF

Considering all the evidence collected for this study and the practicalities of the AQF, it is reasonable to conclude that the recognition of qualifications is generally a key function that will lead to benefits for individuals and for businesses and has the potential to make the governmental management of immigration less complex. However, this needs to be examined in terms of the ways the qualifications frameworks might support qualification recognition. With this in mind, the added value for both frameworks that might be derived from an established relationship could include any of the following.

1. The AQF would benefit from being associated with a framework community (the EQF) with which it has high levels of inward and outward mobility, that is a significant trading partner and that includes countries with which Australia has strong traditional ties.
2. The EQF would benefit from being associated with a high status and a long standing proven framework from the southern hemisphere.
3. AQF has been in place and in use for many years and it has influenced the development of many other national frameworks in the Asia-Pacific region. It is also the case that meta-framework structures are emerging in this region and the Australian influence on these is likely to be significant (for example the ASEAN framework). These regional arrangements will have maximum value only if all of the implied relationships with other frameworks are more or less consistent.
4. For the increasing and substantial number of students and workers moving between the EU countries and Australia, the initial recognition of their qualifications would be eased.
5. The international student market is highly developed in Australia, so that thousands of (mostly Asian) foreign students graduate with Australian qualifications annually. These graduates would benefit from enhanced currency of their qualifications if they can be related to European qualifications structures in an obvious zone of trust.
6. Establishing the relationship between EQF and AQF on some formal level could avoid the danger that informal linkages between the frameworks will develop regardless of official policy. Whilst there are advantages in these informal linkages, there is also the possibility that there may be some distortion of the level of qualification intended in one or both of the frameworks and in the longer term this would present problems for recognition practice and policy.
7. In the EU and to a lesser extent in Australia, an established relationship between the two frameworks would draw attention to, and help overcome, the wasteful incidence of over-education in migrant workers.
8. For Australia and the countries in the EU where there is a central process of recognising qualifications, the establishment of a framework relationship could be used to make the recognition process more strategic and more efficient.

<sup>185</sup> See the role of European Quality Assurance for VET website and European Association for Quality Assurance in Higher Education (2005)

<sup>186</sup> NOOSR and CEP

9. In the EU and Australia the development of the validation of experience is expanding. A relationship between the frameworks could support the recognition of validated experience leading to qualification.
10. At a more practical level, the development of the EQF portal with information about the level of typical qualifications from EU countries has the potential to become a major source of reference information about qualifications from EU countries. Creating a linkage with the EQF could give this portal a more international reach.

## 8.5 The possibilities for linkages

What kind of relationship between EQF and AQF would be of advantage to Australian and EU citizens, qualifications framework managers and the other stakeholder groups who have an interest in the international recognition of qualifications? Based on the evidence presented in this report it is clear that there is an advantage to establishing some kind of formal relationship. However, the very different contextual conditions (for example, policy on migration and free movement of citizens across borders) suggest that some care is needed so that linkage does not suggest qualification equivalence and entitlements. Based on these positions both the weakest options and the strongest options (as set out above in Table 8.1) can be eliminated as possibilities.

There is therefore a focus on relationships that are formal, in the sense that the two managing authorities endorse them, but that they are informal in the sense they are not fixed relationships where specific levels are deemed equivalent or recognition entitlements flow from such a relationship. This kind of relationship might be termed a 'Qualifications Framework Accord' which sets out the rationale, status and scope of on going dialogue and exchange. The need for a Qualifications Framework Accord is based on the acceptance that it will generate mutual added value rather than become a convergent quest for a formal, level to level equivalence across the two frameworks.

There is also a need to maintain consistency of any Qualifications Framework Accord that might be agreed and therefore the conditions for establishing an accord should include the following:

- Leaders of the two frameworks should make statements concerning the value of links;
- The possibility of a relationship and the strength of such a relationship should grow with experience and the maturity of the two frameworks;
- An Accord should have a basis in a zone of mutual trust that is generated by ongoing (managed) engagement of stakeholder groups from Australia and the EU;
- Communication strategies for a wide range of interested parties.

## 9 Recommendations for further action

The earlier sections of this report provide a great deal of information and analysis about the potential role of qualifications frameworks in supporting the mobility of learners and workers. Authorities and institutions concerned with these issues may wish to use this evidence to inform their national practices and processes or to assess them against what other countries are doing. This final section of the report, which is dedicated to the study recommendations, addresses neither the national practice in terms of mobility or workers and learners nor the issues around qualification recognition. The authors have focused their recommendations on the possible future steps in the EU-Australia cooperation on NQFs. This is in line with the initial objectives of the study and the fact that it is expected to contribute to the wider EU-Australia policy dialogue on qualifications frameworks.

The exploration of possibilities for developing a relationship between EQF and AQF, as set out in Section 8 above, leads to the conclusion that:

- There are significant potential gains for both Europe and Australia in developing an appropriate relationship, possibly termed a ‘Qualifications Framework Accord’ between EQF and AQF;
- The option of doing nothing and allowing potentially confusing informal relativities to develop is not in the interests of either region;
- The establishment of a linkage along the lines of a Qualifications Framework Accord involving these frameworks is technically feasible;
- The Qualifications Framework Accord would be a signal of the intention to develop a zone of trust as the EQF project moves to completion and AQF’s new system of levels, titles and qualification types becomes embedded in national practice.

What action could be undertaken now to promote the emergence of a zone of trust and create an environment in which the future relationship between EQF and AQF could be developed?

### 9.1 Recommendation 1: Engage in a critical appraisal of the scenarios for EQF – AQF linkages

Though the development of a Qualifications Framework Accord would appear as a preferred option for the authors of this report, there is a need first to engage a number of key stakeholders in a critical appraisal of the scenarios identified in this analysis. For that purpose a series of informed discussions should be held in Europe as well as in Australia with the stakeholders who are concerned by potential development of linkages between the two frameworks.

It was initially envisaged as part of this assignment that a workshop would be held with key stakeholders from the EU as well as Australia on this topic. However, due to very tight deadlines it was not possible to hold it. In any case such workshop would have been an initial step in collecting first opinions of the different parties. A broader consultation process (possibly with different stages) should be put in place if there is willingness to pursue discussions about EQF-AQF linkages.

Such seminar(s) would enable the gathering of stakeholders’ views on different aspects of the scenarios for EQF-AQF outlined earlier. Ideally, a preferred option would arise from the discussions. If initially no clear option appears, a number of options could be eliminated and the preferred option could be discussed in a second step.

The critical appraisal of the proposed scenarios should cover the following dimensions:

- What is likely to be the positive and negative impact of the other scenarios, compared to the laissez-faire scenario? What risks are associated with the laissez faire scenario?
- What is the stakeholder acceptance of each of the scenarios? Are they more willing to engage with some of the options than with others? How would they be willing to contribute to make either of these scenarios a success?
- What are the implications of each of the scenarios on the resources (financial and human) of the authorities in charge of EQF and AQF? It should not be assumed here that a 'no action scenario' is in all cases the cheapest one. For example, if the authorities are likely to be required to provide guidance on this point, given that they may have an obligation to respond to requests received, issuing such responses would also imply certain costs.

## 9.2 Recommendation 2: If there is support for moving towards a Qualifications Framework Accord, engage in the necessary steps

The European and Australian authorities should initiate a programme of constructive engagement under the aegis of a Qualifications Framework Accord. This should involve policymakers, academics, technical experts in recognition, employers and representatives of other groups with an interest in making the qualification recognition process better, more widely accessible, fairer and efficient.

The Qualifications Framework Accord should set out the possibilities and the limitations on the process of constructive engagement. It should be signed at high level in Australia and within the EU and set out the management, quality control, funding, timescale and terms of reference of the constructive engagement. There should be synergies with programmes and events in Australia and in the EU. These synergies should be optimised through the wording of the Accord.

The basis of work on this study leads to some early suggestions for a programme of activities. For example:

- Joint research projects focussing on issues of current concern such as the need for common alignment of international qualifications within the two frameworks;
- Peer learning activities for developmental purposes, for example, immediate issues related to the quality assurance of frameworks or more long term considerations such as evaluating the potential of linking credit arrangements to frameworks;
- Sectoral working parties to bring about linkage and permeability across natural organisational boundaries;
- Seminars and symposia that involve policy makers and their current policy priorities and could, for example, engage interested parties from outside the EU and Australia.

The primary objective of the programme should be an ongoing exchange and building trust and understanding, so it is essential to the concept that there is active engagement of stakeholders from both regions. An effective approach would be for every activity to result in an outcome document and for these to be disseminated to a wide audience. After some time and on the basis of the exchanges, the outcome documents could be synthesised and a tentative relationship between the frameworks could be proposed for consideration at a joint conference. Any resulting relationship defined by the framework authorities could be adopted generally in an environment of trust and confidence.

### 9.3 Recommendation 3: Discuss other elements of the ‘common language’ to support qualification recognition which need to be used in combination with NQFs

This study of the relationships between the qualifications frameworks of the EU and Australia has focussed on mobility of students and workers and the recognition of their qualifications in other countries. One of the key findings was the common understanding that the level of a qualification (in a framework) is only a first step in qualification recognition. However, many qualifications frameworks are not only about the levels but they also bring clarity about learning outcomes, qualification types or credit. When these aspects are not tackled by qualification frameworks there are often associated instruments which tackle these aspects. There is existing evidence, largely compiled by the Council of Europe, on some other key factors that influence the acceptance of a qualification in another country (see the discussion of *substantial difference*). These other factors are considered important, however they are often more difficult to ‘translate’ into the national system than the NQF level of the qualification.

European level discussions should explore the nature of factors other than the NQF level that govern the recognition of qualifications in other countries with a view to finding a common language that would enable them to be considered in relation to national systems.

As an illustration of what might be explored it is useful to consider the quality assurance of qualifications. Quality assurance conditions that apply to the stages of study and award of qualifications are often cited as critical to the acceptability of qualifications. There are European tools for describing quality assurance procedures: could these be used to enhance the portability of qualifications? The different qualifications frameworks in EU countries and around the world show that some, more than others, regulate quality. How can NQFs aid the recognition of qualifications by making more explicit the quality arrangements that are associated with them?

In addition to national and international experts, such discussions could usefully involve the kinds of agencies and professionals offering views to this study. This would ensure that the discussions are based on the pressing problems of today concerning qualifications recognition.

# ANNEXES

## Annex 1 Additional Statistics

Table A1.1 Top five destinations of tertiary education students from studied countries when going abroad and countries for which the selected countries are among the top five destination for students (country and number of students) – year 2007

	<b>Destination countries of students from studied countries</b>	<b>Countries of origin of incoming students in studied countries</b>
<b>Germany</b>	U.K. (14,011), Austria (12,386), Netherlands (10,170), U.S.A. (8,847), Switzerland (8,322)	<i>Note: Only countries with more than 1000 students in Germany were included.</i> China (23,791), Poland (12,592), Russian federation (12,047), Bulgaria (11,486), Turkey (7,165), Ukraine (6,870), Cameroon (5,139), Austria (5,010), France (5,960), Morocco (4,369), Spain (4,170), Romania (3,981), Republic of Korea (3,901), Italy (3,636), U.S.A (3,554), India (3,421), Georgia (2,895), Greece (2,707), Luxembourg (2,536), Tunisia (2,499) Iran (2,231), Hungary (2,121), Switzerland (2,062), United Kingdom (2,077), Japan (2,039), Czech Republic (1,905), Brazil (1,908), Belarus (1,896), Vietnam (1,844), Kazakhstan (1,625), Indonesia (1,726), Syrian Arab Republic (1,650), Mexico (1,474), Lithuania (1,405), Belgium (1,394), Israel (1,275), Slovakia (1,219), Colombia (1,126), Pakistan (1,130) Mongolia (1,101), Egypt (1,020)
<b>Ireland</b>	United Kingdom (16,254), U.S.A. (1,105), Germany (491), France (454), Australia (171)	United Kingdom (2,282), Kuwait (229)
<b>Greece</b>	United Kingdom (16,051), Italy (5,054), Germany (2,707), U.S.A. (2,030), France (1,952)	Cyprus (11,449), Albania (4,253), Armenia (175)
<b>Italy</b>	Austria (6,209), United Kingdom (5,989), France (4,790), Holy See (4,103)-s, Germany (3,636)	Albania (11,883), Greece (5,054), Romania (2,456), Cameroon (1,614), Poland (1,478), Switzerland (1,371), Croatia (1,353), Peru (1,243), Israel (1,121), Argentina (560), Ecuador (421), Slovenia (387) FYROM (305)
<b>Malta</b>	United Kingdom (815), Italy (44), Germany (35), U.S.A. (28), Australia (20)	San Marino (47)
<b>Netherlands</b>	United Kingdom (2,811), Belgium (2,089), U.S.A. (1,622), Germany (909), France (626)	Germany (10,170), Belgium (991), Suriname (313)
<b>Poland</b>	Germany (12,592), United Kingdom (6,768), France (3,396), U.S.A. (2,872), Italy (1,478)	Belarus (1,780), Ukraine (2,672), Norway (911)
<b>United Kingdom</b>	U.S.A. (8,625), France (2,595), Ireland (2,282), Germany (2,077), Australia (1,687)	<i>Note: Only countries with more than 1000 students in the UK were included.</i> China (49,594), India (23,833), Greece (16,051), Ireland (16,254), U.S.A. (15,956), Germany (14,011), Nigeria (11,136), Malaysia (11,811), France (13,068), Hong Kong (9,639), Pakistan (9,307), Cyprus (8,712), Poland (6,768), Spain (6,352), Italy (5,989), Japan (5,706), Canada (5,010), Thailand (4,543), Republic of Korea (4,311), Saudi Arabia (3,249), Singapore (3,201), Norway (3,017), Portugal (3,010), Sweden (3,382), Sri Lanka (3,005), Netherlands (2,811),

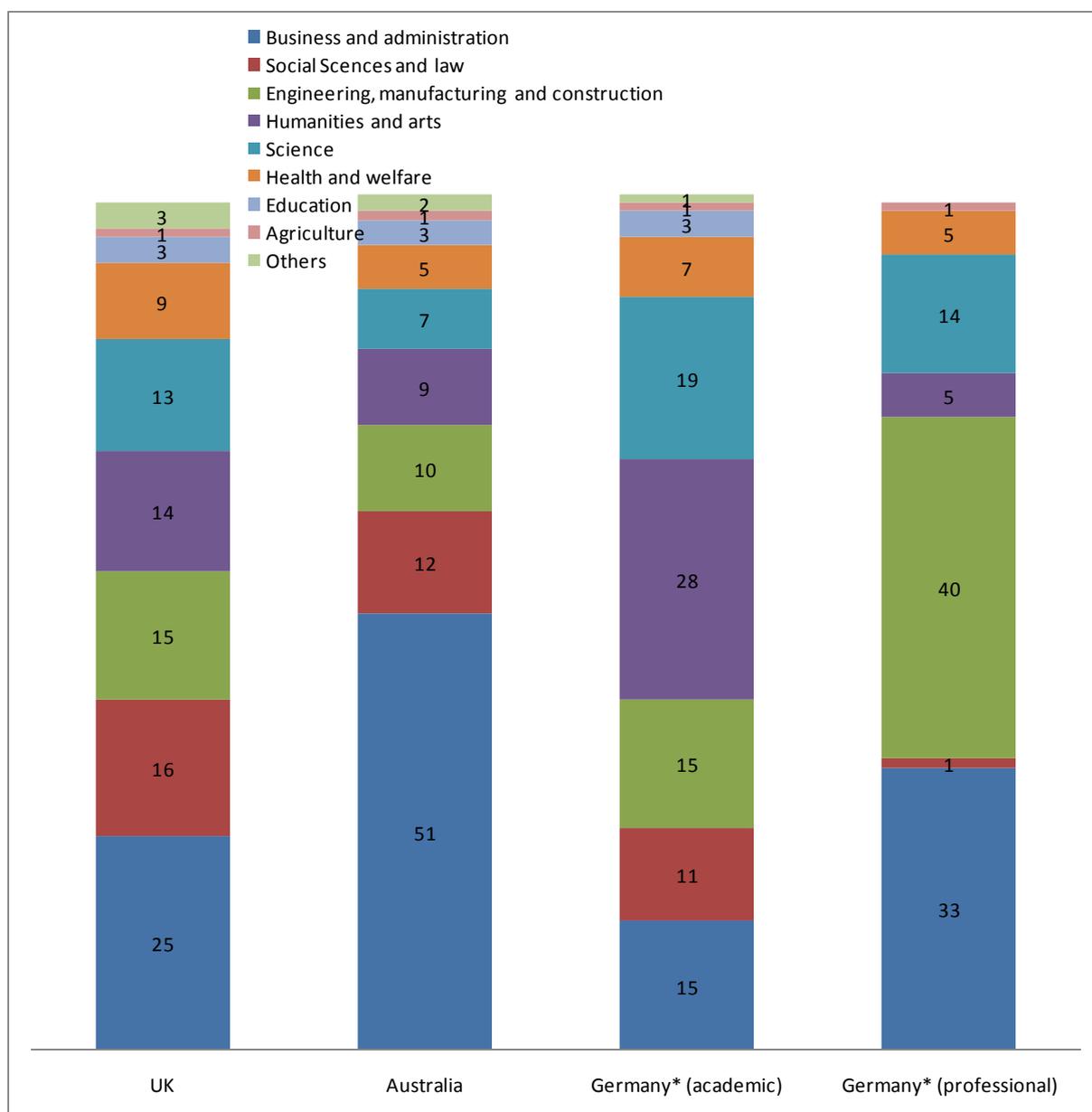
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		Kenya (2,759), Ghana (2,675), Bangladesh (2,675), Russian federation (2,580), Belgium (2,560), Zimbabwe (2,475), Iran (2,454), U.A.E (2,218), Switzerland (1,896), Mauritius (1,886), Australia (1,771), South Africa (1,699), Libya (1,686), Finland (1,699), Mexico (1,663), Denmark (1,567), Jordan (1,503), Lithuania (1,487), Austria (1,430), Oman (1,324), Brazil (1,313), Egypt (1,204), Brunei (1,206), Kuwait (1,163), Czech Republic (1,152), Tanzania (1,049), Hungary (1,040)
<b>Australia</b>	U.S.A. (2,859), New Zealand (2,750), United Kingdom (1,771), Germany (392), Japan (361)	<p><i>Note: Only countries with more than 1000 students in Australia were included.</i></p> <p>China (50,418) India (24,523) Malaysia (17,691) Hong Kong (13,464) Indonesia (10,536) Singapore (9,429) Republic of Korea (5,430) Thailand (4,884) Vietnam (4,042) Canada (4,039) Sri Lanka (3,550) Japan (3,249) U.S.A (3,023) Bangladesh (2,902) Nepal (2,358) Pakistan (2,090) New Zealand (2,008) United Kingdom (1,687) Norway (1,479) Zimbabwe (1,361) Kenya (1,278) Saudi Arabia (1,244), U.A.E (1,120) Mauritius (1,087)</p>

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Source: UNESCO (2009) *Global education digest 2009*, table 10

Figure A1.1 Foreign students' choice of field of study in Australia, UK and Germany (percentage of foreign students in the country) – 2007



\*The originally available data for Germany were regrouped into the UNESCO categories, the national categorisation is different  
Sources: UNESCO<sup>187</sup> and DAAD<sup>188</sup>

In Germany, a more detailed break-down of foreign students per fields of study shows that the most popular study disciplines for foreign students are<sup>189</sup>:

- Economics, business and administration (21,942 and 14,742 students in academic and professional higher education respectively);
- Information technology (12,415 and 6,746);

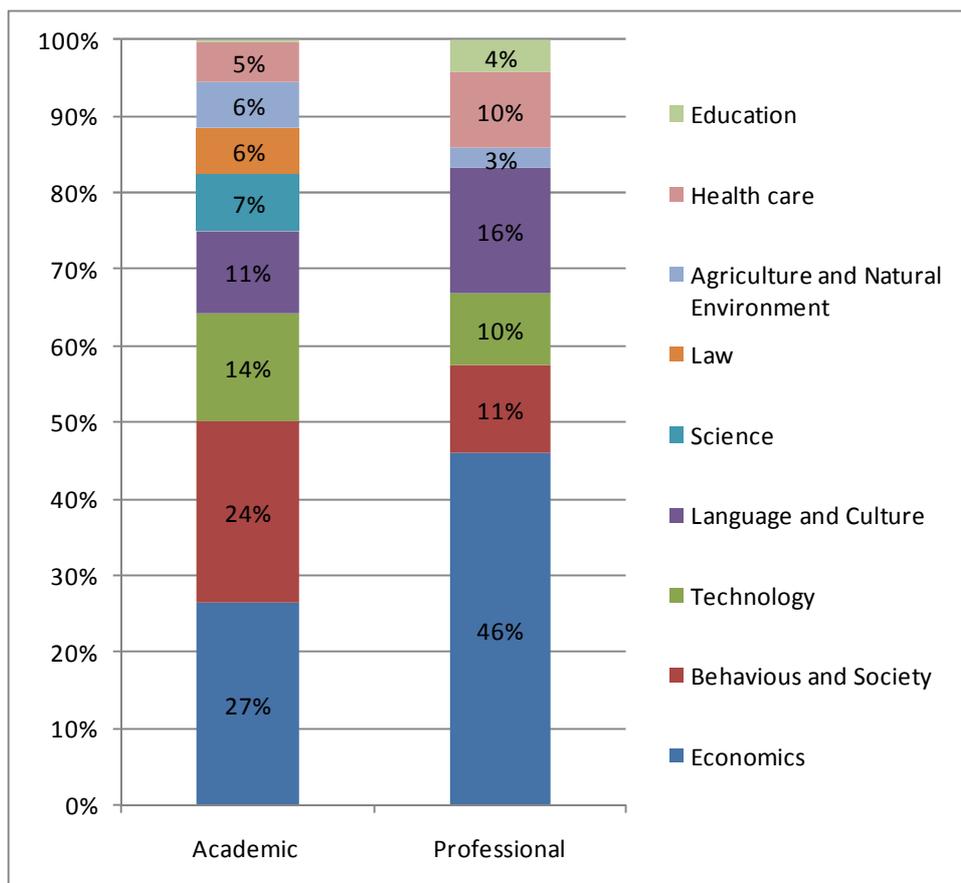
<sup>187</sup> UNESCO institute for statistics (25/03/2010)

<sup>188</sup> DAAD (2010)

<sup>189</sup> Idem

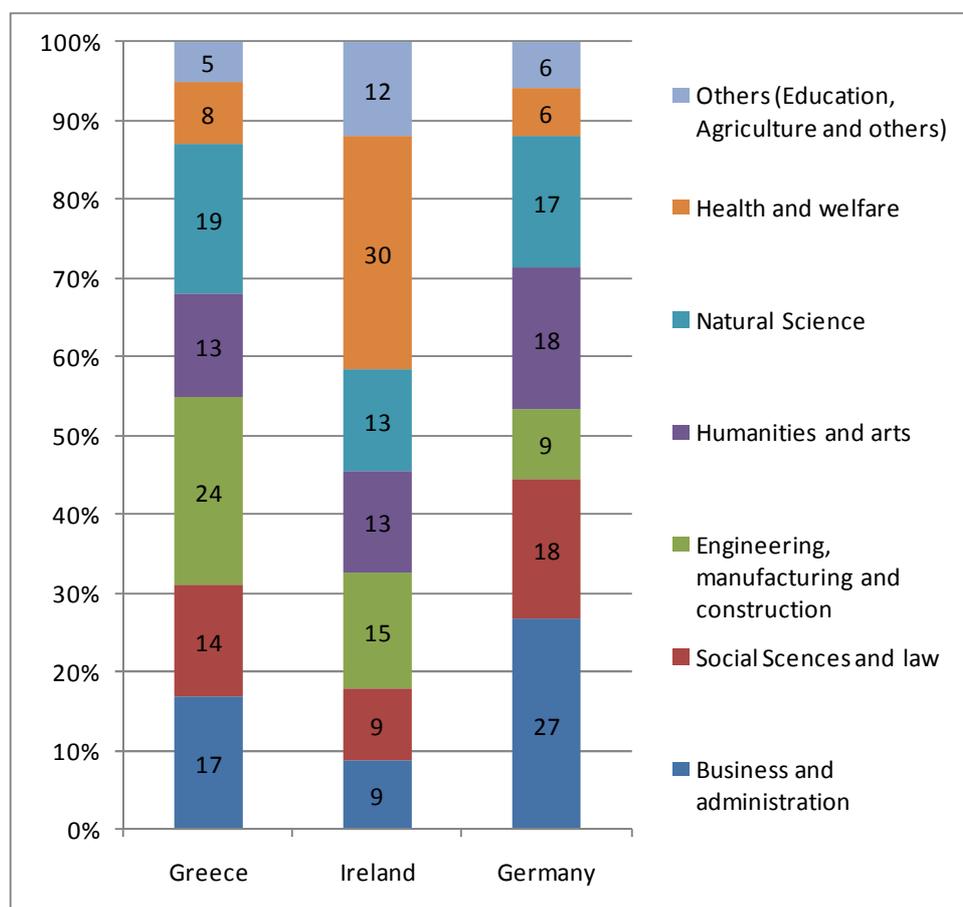
- Mechanical and process engineering (9,495 and 8,657);
- Electrotechnology (8,115 and 6,769)
- Studies of German language and literature (13,574 students in academic higher education);
- Law (9,055 and 705);
- Medicine (8,717 students in academic higher education);

Figure A1.2 Foreign students' choice of fields of study in the Netherlands (as percentage of total foreign students) – 2009-2010 academic year



Source: Nuffic (2010) *Mapping Mobility 2010*

Figure A1.3 Choice of fields of study of outgoing students (percentage of total number of outgoing students)



Source: UNESCO<sup>190</sup>

Table A1.2 Immigration by groups of citizenship – 2008 (numbers and percentage of the total immigration)

	Total immigration	Of which returning nationals	Immigration of EU MS	Immigration from outside the EU
<b>Germany</b>	682,100	108,300 (16%)	335,900 (49%)	237,900 (34%)
<b>Ireland</b>	63,900	17,900 (28%)	32,100 (50%)	13,500 (21%)
<b>Greece</b>	n/a (74,700 excluding returning nationals)	n/a	25,700 (34% of foreign immigrants)	49,000 (66% of foreign immigrants)
<b>Italy</b>	534,700	38,200 (7%)	212,900 (40%)	283,700 (53%)
<b>Malta</b>	9,000	1,200 (13%)	4,500 (50%)	3,300 (37%)
<b>The Netherlands</b>	143,500	40,200 (28%)	55,400 (39%)	38,900 (27%)
<b>Poland</b>	47,900	35,900 (75%)	3,100 (6%)	8,900 (19%)
<b>United Kingdom</b>	590,200	85,100 (14%)	197,700 (33%)	307,400 (52%)

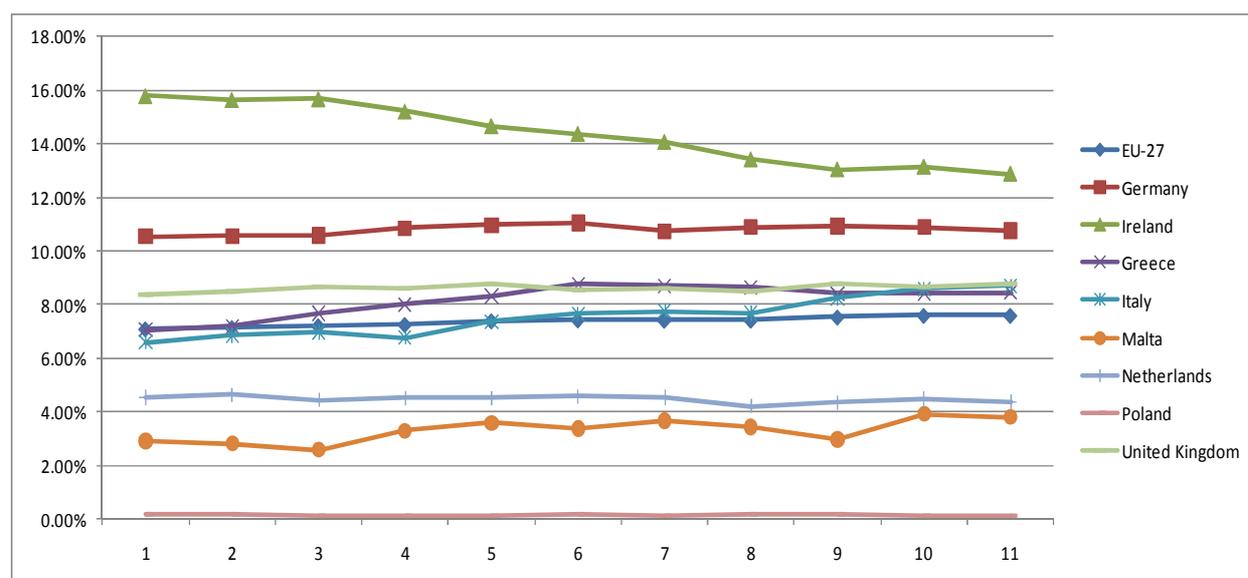
Source: Eurostat (2011) Statistics in Focus 1/2011

<sup>190</sup> UNESCO institute for statistics (25/03/2010)

Table A1.3 Proportion of people (25-64 years old) with foreign nationality as a proportion of the total population aged 25-64

	2008 Q2	2008 Q3	2008 Q4	2009 Q1	2009 Q2	2009 Q3	2009 Q4	2010 Q1	2010 Q2	2010 Q3	2010 Q4
<b>EU-27</b>	7.10%	7.14%	7.21%	7.26%	7.40%	7.43%	7.42%	7.42%	7.54%	7.60%	7.60%
<b>Germany</b>	10.55 %	10.56 %	10.58 %	10.84 %	10.98 %	11.04 %	10.75 %	10.89 %	10.92 %	10.90 %	10.76 %
<b>Ireland</b>	15.80 %	15.65 %	15.68 %	15.21 %	14.66 %	14.37 %	14.07 %	13.42 %	13.03 %	13.14 %	12.87 %
<b>Greece</b>	7.06%	7.20%	7.67%	8.02%	8.32%	8.75%	8.70%	8.64%	8.42%	8.44%	8.45%
<b>Italy</b>	6.60%	6.86%	6.99%	6.77%	7.38%	7.66%	7.76%	7.69%	8.24%	8.59%	8.70%
<b>Malta</b>	2.91%	2.82%	2.59%	3.31%	3.60%	3.37%	3.67%	3.44%	2.98%	3.93%	3.80%
<b>Netherlands</b>	4.54%	4.63%	4.45%	4.53%	4.52%	4.58%	4.53%	4.22%	4.34%	4.48%	4.37%
<b>Poland</b>	0.18%	0.18%	0.13%	0.14%	0.13%	0.17%	0.11%	0.18%	0.19%	0.14%	0.14%
<b>United Kingdom</b>	8.40%	8.49%	8.68%	8.62%	8.76%	8.54%	8.62%	8.48%	8.78%	8.69%	8.80%

Source: Eurostat, Labour Force Survey



Based on the European labour force survey, the Tables A-3 and A-4 in the Annex 1 show that:

- In the EU, nearly 8% of total population aged 25-64<sup>191</sup> are people with foreign nationality and nearly 3% are people of other EU-27 nationality than that of the country declaring the data;
- Ireland has the highest share of foreign population aged 25-64 and also has the highest share of population of other EU-27 countries, but the share of foreign population in Ireland has decreased following the economic recession;
- In addition to Ireland, Germany, Greece, Italy and the United Kingdom all have more than 5% of population aged 25-64 who are of foreign nationality;
- With the exception of Ireland, where people with other EU nationality constitute nearly three quarters of the foreign population aged 25-64, EU nationals account for less than half of the foreign population aged 25-64 in the studied countries.

Poland and Malta, which are traditionally countries of emigration, have recently also started to attract foreign workers. Even though the number of foreign workers remains rather low in comparison to the other countries, they are rising. While there were only 10,000 work permits issued in 2006 in Poland, the number increased to 18,000 in 2008. Malta's volume of employment licences delivered, has risen since 2005 and in 2009, 7,130 persons were granted a work permit.<sup>192</sup>

Table A1.4 Proportion of people (25-64 years old) with EU-27 nationality (except the declaring country) as a proportion of the total population aged 25-64

	2008 Q2	2008 Q3	2008 Q4	2009 Q1	2009 Q2	2009 Q3	2009 Q4	2010 Q1	2010 Q2	2010 Q3	2010 Q4
<b>EU-27</b>	2.58%	2.59%	2.65%	2.67%	2.70%	2.73%	2.73%	2.73%	2.84%	2.87%	2.87%
<b>Germany</b>	3.93%	3.96%	3.94%	4.04%	4.06%	4.04%	3.98%	3.98%	4.06%	4.06%	3.96%
<b>Ireland</b>	11.42 %	11.18 %	11.39 %	10.78 %	10.67 %	10.41 %	10.11 %	9.66%	9.43%	9.47%	9.28%
<b>Greece</b>	1.36%	1.45%	1.52%	1.54%	1.60%	1.72%	1.68%	1.65%	1.59%	1.59%	1.55%
<b>Italy</b>	1.81%	1.98%	2.04%	1.93%	2.21%	2.41%	2.43%	2.41%	2.68%	2.76%	2.75%
<b>Malta</b>	1.48%	1.30%	1.25%	1.46%	1.63%	1.41%	1.36%	1.74%	1.75%	2.49%	1.75%
<b>Netherlands</b>	1.93%	1.88%	1.87%	1.99%	1.87%	2.09%	2.01%	1.72%	1.93%	1.98%	1.94%
<b>Poland</b>	0.05%	0.05%	0.04%	:	0.03%	0.04%	0.03%	0.05%	0.04%	0.03%	0.04%
<b>United Kingdom</b>	3.52%	3.51%	3.57%	3.67%	3.71%	3.66%	3.61%	3.69%	3.98%	4.10%	4.15%

Source: Eurostat, Labour Force Survey

<sup>191</sup> This age range has been chosen so as to minimise the overlap with data about foreign students.

<sup>192</sup> <http://www.timesofmalta.com/articles/view/20091110/local/7-130-foreigners-granted-work-permits-between-january-and-august.281130>

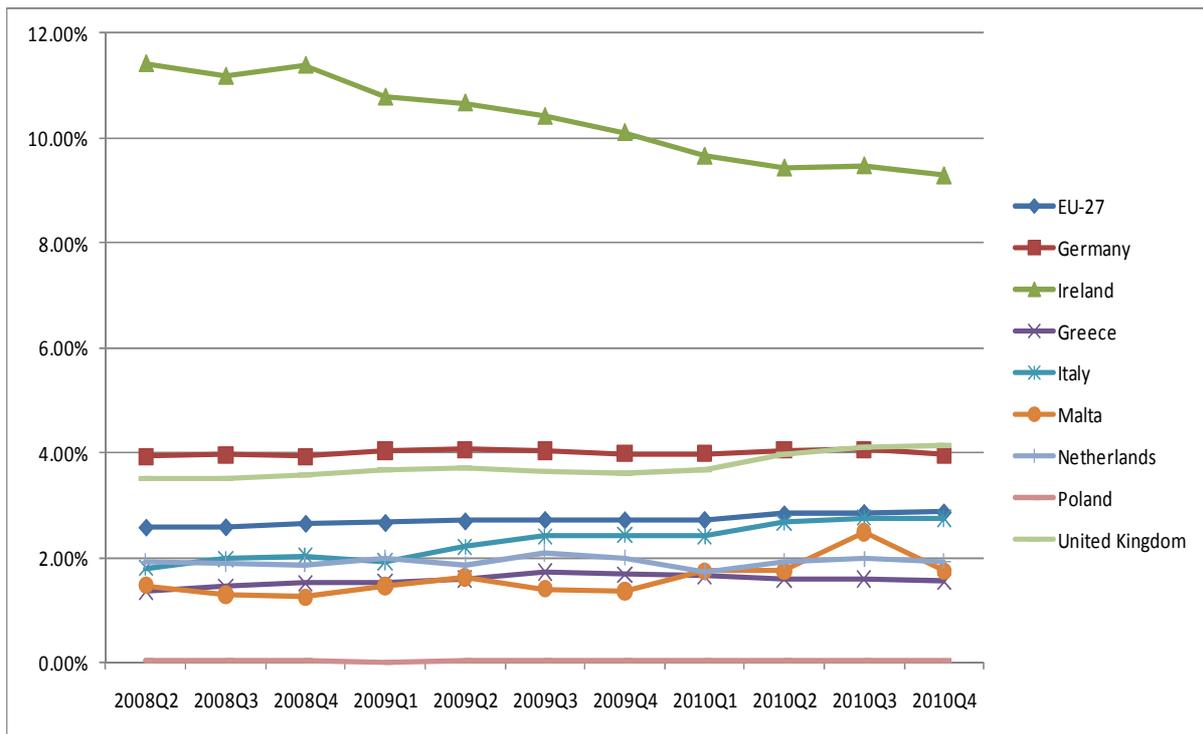
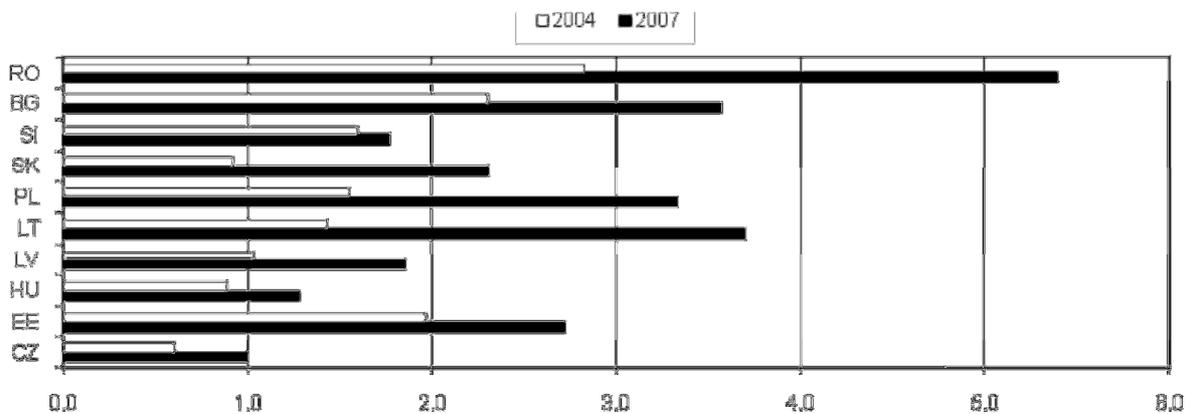
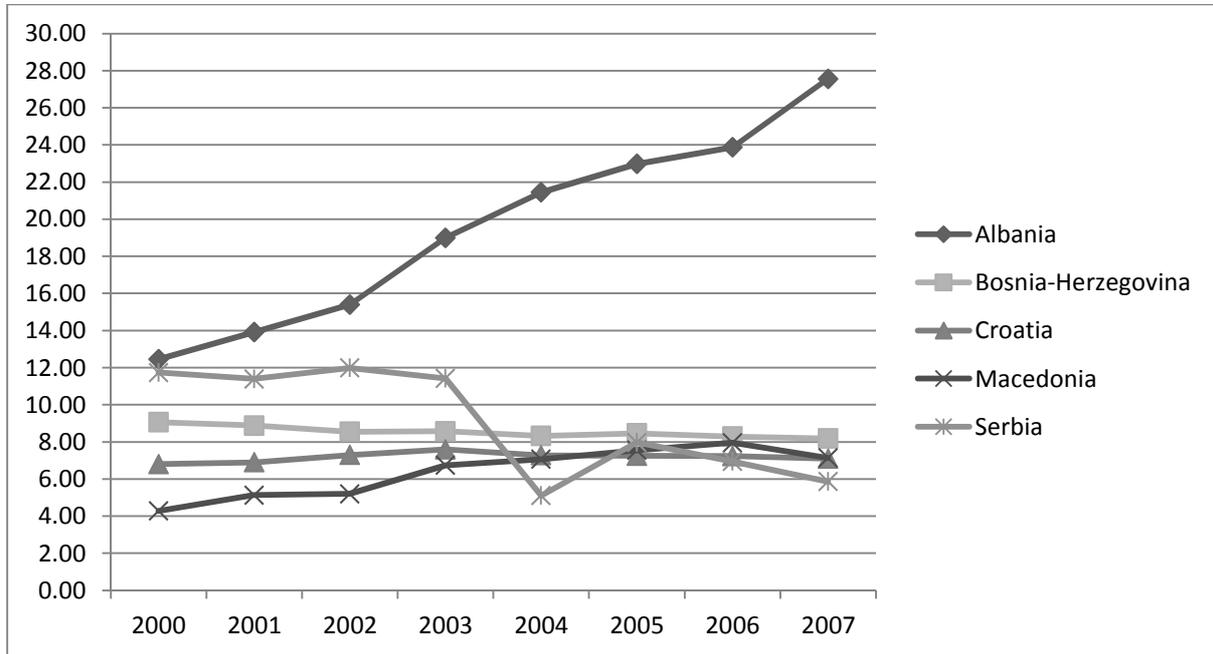


Figure A1.4 Migrants from central and Eastern European EU countries towards EU-15 countries as a proportion of sending countries' total population (share in %)



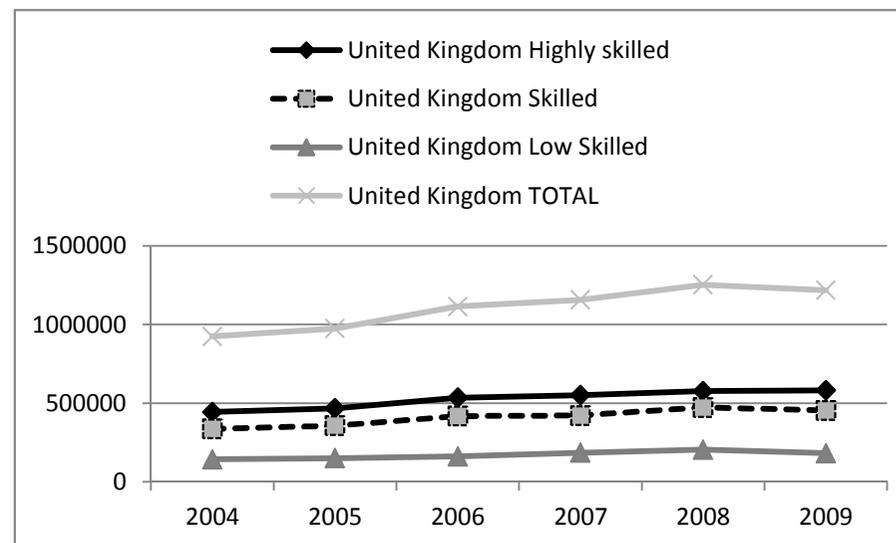
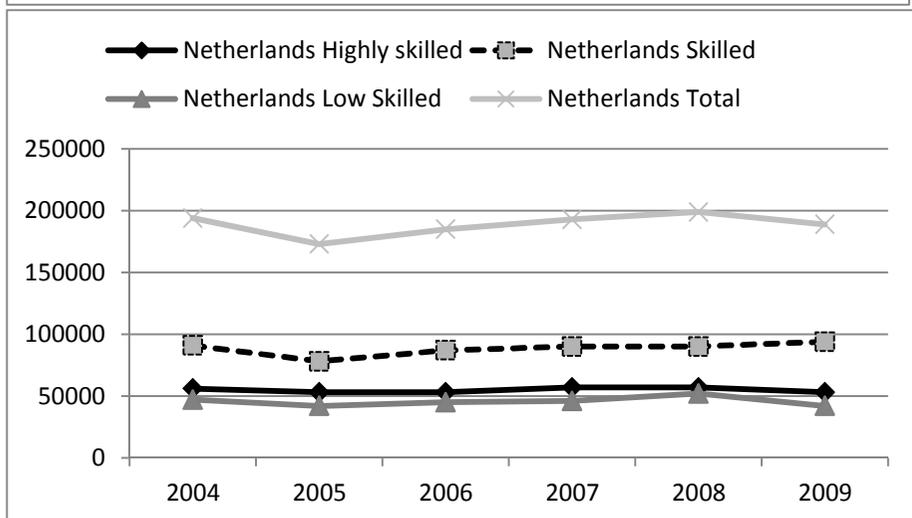
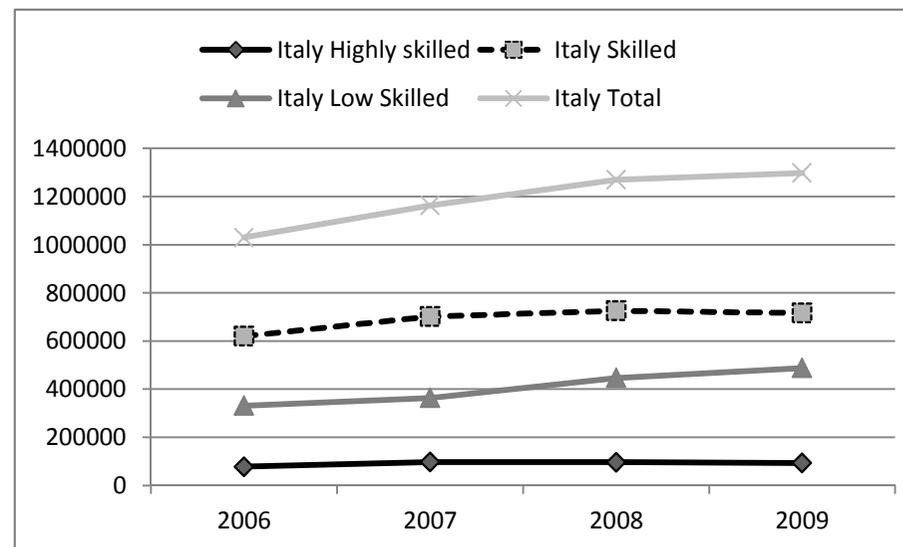
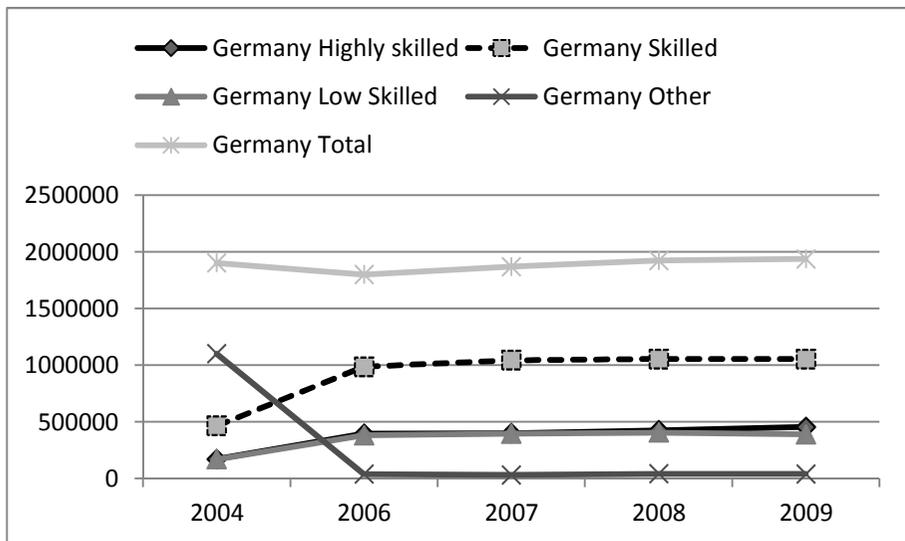
Source: Eurostat LFS in Gligorov (2009) *Mobility and Transition in Integrating Europe*

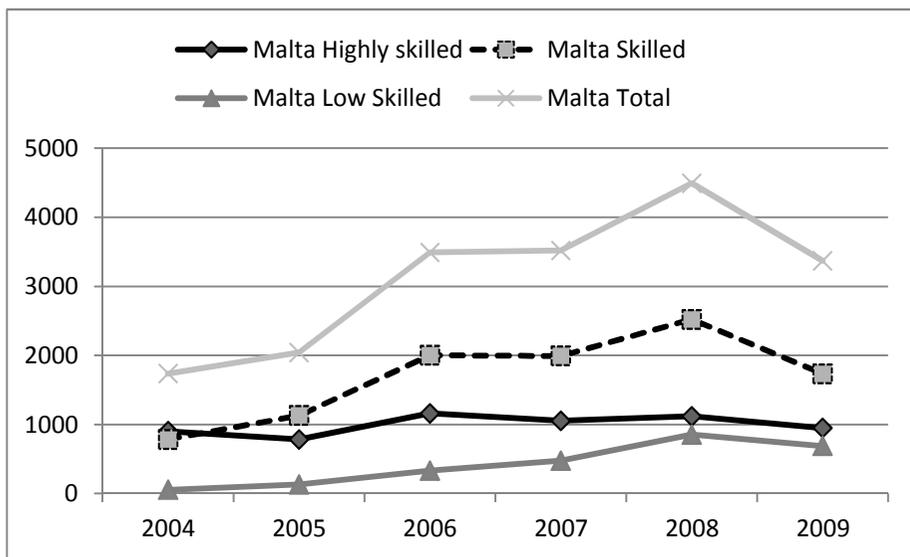
Figure A1.5 Population from Southeast Europe neighbouring countries in the EU-15 as a percentage of the population of the sending country



Source: Gligorov (2009) *Mobility and Transition in Integrating Europe*

Figure A1.6 Skill levels and numbers of third country nationals migrants in the selected countries





Source: European Migration Network (2011) *Synthesis report: Satisfying Labour Demand through migration*

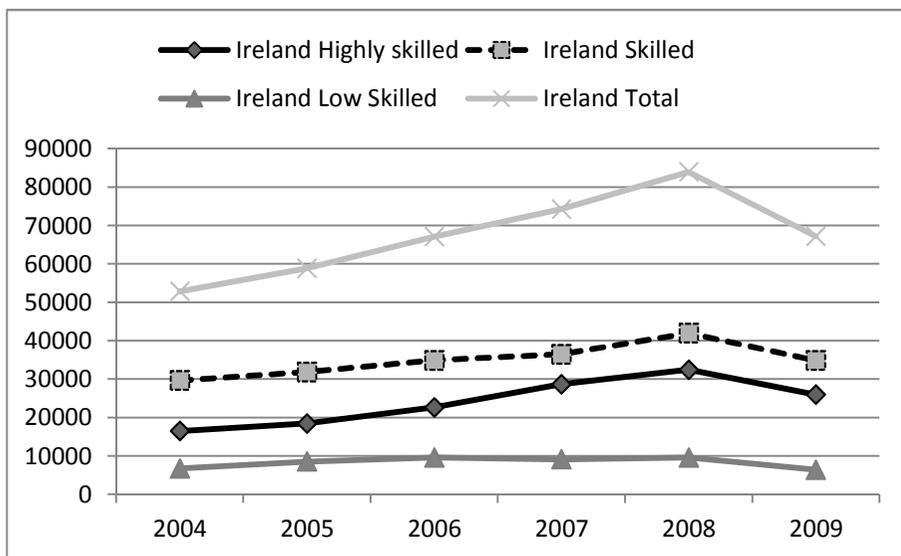
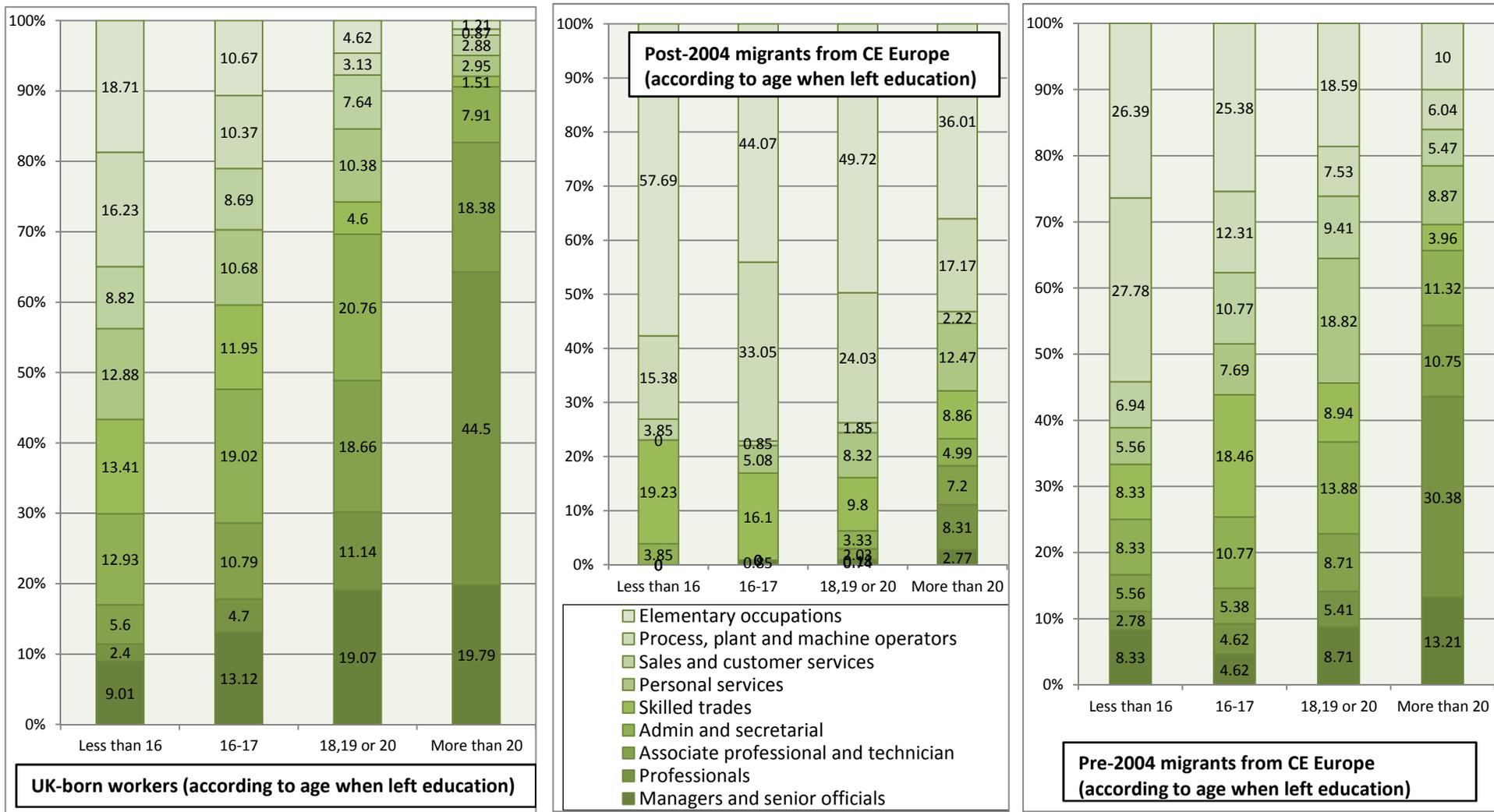


Figure A1.7 Distribution of occupation by age when persons left education: UK born workers, pre-2004 migrants from central and eastern Europe in the UK, post-2004 migrants from central and eastern Europe in the UK



Source: European Integration Consortium (2009) *Labour mobility within the EU in the context of enlargement and the functioning of transitional arrangements*

Table A1.5 Migrant workers in selected professions: percentage of migrants from outside the EU-27 and from other EU Member States as proportion of the total workforce or as proportion of foreign workforce

As share of total workforce	Housekeeping and restaurant services workers		Health professionals (except nursing)		Medical doctors		Nursing and midwifery professionals	
	Outside EU	EU *	Outside EU	EU *	Outside EU	EU *	Outside EU	EU *
Czech Republic (2009)	1%	2%			1%	6%	0%	2%
Germany (2009)	14%	9%	2%	3%				
Finland (2007)	4%	1%			1%	2%	0%	0%
France (2008)	10%	3%						
Ireland (2009)	9%	23%	13%	5%			13%	4%
Malta (2009)	5%	4%			2%	1%	1%	0%
United Kingdom (2009)	9%	7%			16%	5%	9%	3%
<b>As share of foreign workforce</b>								
Hungary (2009)	89%	11%			38%	63%	33%	67%
Slovenia (2009)	99%	1%			98%	2%		
Slovak Republic (2009)	69%	31%			72%	28%	33%	67%
As share of total workforce	Skilled Agricultural and Fishery Workers		Architects, Engineers and related professionals		Teaching personnel		Labourers in Mining, Construction, Manufacturing And Transport	
	Outside EU	EU	Outside EU	EU	Outside EU	EU	Outside EU	EU
Czech Republic (2009)	3%	3%	1%	3%	1%	1%	20%	10%
Germany (2009)	3%	2%	3%	3%	3%	3%	5%	83%
Finland (2007)	1%	1%	1%	1%	1%	1%	1%	97%
France (2008)	2%	0%	0%	2%	0%	1%	0%	94%
Ireland (2009)	0%	9%	3%	10%	1%	4%	22%	78%
Malta (2008)	1%	1%	3%	3%	1%	1%	0%	98%
United Kingdom (2009)	1%	2%	4%	3%	3%	3%	3%	8%
<b>As share of foreign workforce</b>								
Hungary (2009)	6%	94%	44%	56%	43%	57%	73%	
Slovenia (2009)	97%	3%			87%	13%	0%	
Slovak Republic (2009)	54%	46%	20%	80%	43%	57%	79%	

Source: European Migration Network (2011) *Synthesis report: Satisfying Labour Demand through migration*

Table A1.6 Bilateral agreements on qualification recognition in countries studied

Country	List of agreements
<b>Germany</b>	Agreements on recognition of <u>students'</u> qualifications with the following countries: Bolivia, China, France, Latvia, the Netherlands, Austria, Poland, Switzerland, Slovakia, Spain, Czech Republic, Hungary and Cyprus.
<b>Greece</b>	No such agreements were identified (note that Greece did not sign nor ratify the Lisbon Convention on Qualification Recognition).
<b>Ireland<sup>193</sup></b>	Ireland does not multiply qualification recognition agreements. Instead it issues statements on qualifications' comparability <sup>194</sup> . Agreement on Recognition of Qualifications with China. Comparability of Qualifications with the UK. Comparability of Qualifications with New Zealand. Comparability of Qualifications Frameworks with Australia.
<b>Italy<sup>195</sup></b>	Italy is a part of huge number of bilateral and multilateral agreements on the recognition of qualifications solely for the purpose of further <u>studies</u> . These include: bilateral agreements with Argentina (1999), Australia (1997), Austria (2000, updated 2003, 2009), China (2005), Cyprus (2009), Ecuador (1955, 1961), France (1984, 1996, 2000), Germany (1996), Malta (1991), Mexico (1982), United Kingdom (1996), Slovenia (1995), San Marino (1984, updated 1990, 1991, 2000), Spain (1955, updated 1999, 2001), Vatican City (1994), and Switzerland (1998, 2001).
<b>Poland<sup>196</sup></b>	Poland is party to the following bilateral agreements on the recognition for academic purposes (non-UE countries): Poland – Ukraine (signed in April 2005), in force since 20th June 2006, Poland – Belarus (signed in April 2005), in force since 12th December 2005. Bilateral agreement between Poland and Russian Federation is being consulted on. Moreover, Poland was bound by some bilateral and international agreements on recognition which have already been renounced. Credentials issued during the time when given agreement was in force are recognized by the Ministry on its basis. This refers to credentials from the following countries: Armenia, Belarus, Bosnia and Herzegovina, Croatia, Cuba, Federal Republic of Yugoslavia, Kazakhstan, Korea (Peoples' Democratic Republic of Korea), Kyrgyzstan, Libya, Macedonia, Moldova, Mongolia, Russian Federation, Serbia and Montenegro, Syria, Ukraine, Uzbekistan, Tajikistan, and Vietnam.
<b>Australia<sup>197</sup></b>	Australia participates in two important agreements in this field: Australia-China Arrangement on Higher Education Qualifications Recognition (renewed 2011) and Agreement on the Recognition of Academic Qualifications (ARAQ) between Australia and France. Moreover, Universities Australia (then the Australian Vice-Chancellors Committee), the CPU (their French equivalent) and the CDEFI (the French conference of engineering schools) signed the agreement in 1999 (updated 2009). Australia has signed other Memoranda of Understanding in education and training but these do not systematically include a clause on qualifications' recognition.

<sup>193</sup> The National Qualifications Authority of Ireland (2004)

<sup>194</sup> See also the International Qualifications Database <http://www.qualificationsrecognition.ie/qualification-recognition-service-database.html>

<sup>195</sup> Ministry of Foreign Affairs:  
[http://www.esteri.it/MAE/EN/Politica\\_Estera/Cultura/Universita/Riconoscimento\\_titoli\\_studio/Accordi\\_governativi.htm?LANG=EN](http://www.esteri.it/MAE/EN/Politica_Estera/Cultura/Universita/Riconoscimento_titoli_studio/Accordi_governativi.htm?LANG=EN)

<sup>196</sup> Ministry of Higher Education <http://www.nauka.gov.pl/szkolnictwo-wyzsze/system-szkolnictwa-wyzszego/mobilnosc-akademicka-i-zawodowa/uznawanie-wyksztalcenia/akty-prawne/>

<sup>197</sup> Australian Education International: Bilateral relationships  
<http://www.aei.gov.au/AEI/GovernmentActivities/GovernmentRelations/BilateralRelationships/Default.htm>

## Annex 2 Topics from interviews

Topics arising from interviews			UK-1	UK-2	UK-3	DE-1	DE-2	PL-1	PL-2	PL-3	MT-1	NL-1	NL-2	NL-3	IE-1	IE-2	IE-3	IT-1	EL-1	EL-2			
students	What works well with recognition	Main HE qualifications – thanks to Bologna process	✓	✓	✓		✓	✓			✓		✓										
		Use of bilateral agreements					✓																
		Publicly available information on comparisons with national system					✓			✓		✓					✓						
		Recognition of foreign qualifications for entry to HE is good	✓										✓						✓				
	Issues with recognition	VET qualifications are complex (great variety) – difficulties for recognition		✓		✓	✓			✓		✓					✓						
		Different nature of VET systems (dual, school based etc.)					✓					✓			✓								
		Lack of networks that provide information/ difficulty to get information from network members								✓	✓		✓		✓		✓						
		Rules/guidelines exist but are not well known				✓		✓											✓	✓			
		Even for main HE qualifications differences in duration	✓																			✓	
		HEIs have different rules for recognition		✓		✓																	
		Individual teaching staff applies different rules and standards				✓														✓			
		Lack of understanding of certain types of qualifications (e.g. professional BA awards, integrated degrees)		✓	✓		✓							✓	✓			✓		✓		✓	
	Lack of information for prospective students				✓																		
No quality assurance of recognition procedures				✓																			
workers	Role of qualifications in workers' mobility – especially third countries	There is a recognition procedure for migrants				✓						✓											
		Employers willingness to pay at minimum a defined wage/ offer a job				✓							✓	✓	✓	✓	✓						
		Better chances for migration depending on qualification				✓							✓			✓							
	Issues with recognition	Lack of coherent policy				✓		✓		✓		✓											
		Employers do not expect the same level depending on the country	✓																				

		Employers do not understand foreign qualifications				✓				✓				✓			✓				
		Multinational companies only have the structures and knowledge to recognise foreign qualifications									✓							✓			
	Impacts of lack of recognition	Unequal treatment				✓												✓			
		Employment (wage) below the level of qualifications and skills				✓					✓				✓			✓			
Qualification	Aspects of qualifications that matter for recognition	Only nationally recognised qualifications are recognised abroad									✓	✓	✓	✓		✓		✓			
		For 'informal recognition' the perception employers/prospective students have matters	✓																		
		Duration matters also for informal recognition	✓																✓	✓	
		Comparison of qualification content		✓					✓		✓	✓							✓	✓	
		The type of awarding institution																	✓	✓	✓
		How does the foreign qualification compare to national level (and vice-versa)		✓			✓		✓			✓								✓	
		How does the type of qualification compare to national types of qualifications (and vice-versa)		✓			✓		✓			✓		✓					✓		
		What does the qualification allow for								✓					✓				✓		
Qualification frameworks	Expectations from qualifications frameworks for recognition	Expectations of added value	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓			
		Expectations of increased transparency (in particular non HE qualifications)						✓		✓	✓	✓									
		Recognition of all forms of learning				✓															
		With NQFs in place it will be easier to contact persons in foreign countries who will be competent to explain the national system									✓										
		Other					✓									✓	✓	✓			
		EQF as a useful as a transparency tool for recognition										✓	✓		✓	✓	✓				
	Limitations of QFs for recognition	NQF oriented at recognition within the country				✓	✓					✓									
		Level of qualification is not sufficient for recognition more about content needed in any case										✓	✓						✓		
		Informal recognition: employers are not necessarily interested in level or description of LO	✓																		
		Too much transparency can be used for exclusion rather than recognition	✓									✓						✓			
It will take time before common understanding among all actors within a country and internationally is reached											✓							✓			



## Annex 3 Sources reviewed through initial desk research

### A3.1 Germany

Types of source	Hyperlink
Website of the Ministry of Home Affairs	<a href="http://www.bmi.bund.de/DE/Themen/MigrationIntegration/AsylZuwanderung/Arbeitsmigration/Arbeitsmigration_node.html">http://www.bmi.bund.de/DE/Themen/MigrationIntegration/AsylZuwanderung/Arbeitsmigration/Arbeitsmigration_node.html</a> <a href="http://www.bmi.bund.de/EN/Themen/MigrationIntegration/AsylZuwanderung/EinreiseAufenthalt/EinreiseAufenthalt_node.html">http://www.bmi.bund.de/EN/Themen/MigrationIntegration/AsylZuwanderung/EinreiseAufenthalt/EinreiseAufenthalt_node.html</a>
Newspaper	<a href="http://www.spiegel.de/unispiegel/jobundberuf/0,1518,752717,00.html">http://www.spiegel.de/unispiegel/jobundberuf/0,1518,752717,00.html</a> <a href="http://www.lto.de/de/html/nachrichten/1832/wie-die-hilfe-aus-dem-ausland-zum-einsatz-kommt/">http://www.lto.de/de/html/nachrichten/1832/wie-die-hilfe-aus-dem-ausland-zum-einsatz-kommt/</a>
Ministry of Labour and Social Policy	<a href="http://www.bmas.de/portal/13256/foerderung_migranten.html">http://www.bmas.de/portal/13256/foerderung_migranten.html</a> <a href="http://www.bmas.de/portal/34724/arbeitsmarkt.html">http://www.bmas.de/portal/34724/arbeitsmarkt.html</a> <a href="http://www.bmas.de/portal/11020/auslaenderbeschaeftigung.html">http://www.bmas.de/portal/11020/auslaenderbeschaeftigung.html</a> <a href="http://www.bmas.de/portal/26140/2008_05_19_saisonarbeit_landwirtschaft.html">http://www.bmas.de/portal/26140/2008_05_19_saisonarbeit_landwirtschaft.html</a> <a href="http://www.bmas.de/portal/11020/auslaenderbeschaeftigung.html">http://www.bmas.de/portal/11020/auslaenderbeschaeftigung.html</a>
Federal office for migration and refugees	- <a href="http://www.bamf.de/DE/Migration/Arbeiten/arbeiten-node.html">http://www.bamf.de/DE/Migration/Arbeiten/arbeiten-node.html</a>
German Trade Union Federation education section	<a href="http://www.migration-online.de/pub_newsletter_X19pbml0PTEmYW1wO3BpZD0yMQ_.html">http://www.migration-online.de/pub_newsletter_X19pbml0PTEmYW1wO3BpZD0yMQ_.html</a> <a href="http://www.migration-online.de/migstat/search.html">http://www.migration-online.de/migstat/search.html</a>
German academic exchange service	- <a href="http://www.daad.de/portrait/presse/publikationen/11377.de.html">http://www.daad.de/portrait/presse/publikationen/11377.de.html</a>
Other	<a href="http://www.wbv.de/fachzeitschriften.html">http://www.wbv.de/fachzeitschriften.html</a>

### A3.2 Greece

Types of source	Hyperlink
EMN Report Annual Policy Report, Greece 2009	<a href="http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=7115524EAA905F82BC741D160A0B90FB?fileID=946">http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=7115524EAA905F82BC741D160A0B90FB?fileID=946</a>
EMN Report Migration and International Statistics, Annual Report for Greece, 2008	<a href="http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=3AE5BB82DFF020F08F1947D0F5DBAE2D?fileID=1110">http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=3AE5BB82DFF020F08F1947D0F5DBAE2D?fileID=1110</a>
EMN Report on Highly Skilled Workers Kanellopoulos, C. and Cholezas, I. (2006), Conditions of entry and residence of Third Country Highly Skilled Workers in Greece, Centre of Planning and Economic Research, EMN Research, Athens 2006	<a href="http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=7115524EAA905F82BC741D160A0B90FB?fileID=481">http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=7115524EAA905F82BC741D160A0B90FB?fileID=481</a>
Hellenic NARIC Website	<a href="http://www.doatap.gr">www.doatap.gr</a>
Greek Statistics Portal	<a href="http://www.statistics.gr">www.statistics.gr</a>
OECD Statistics Database	<a href="http://stats.oecd.org/Index.aspx?DatasetCode=RFOREIGN">http://stats.oecd.org/Index.aspx?DatasetCode=RFOREIGN</a>

Foreign students abroad	
Eurydice Greece Report 2009, National system overviews on education systems in Europe and ongoing reforms	<a href="http://eacea.ec.europa.eu/education/eurydice/documents/eurybase/national_summary_sheets/047_EL_EN.pdf">http://eacea.ec.europa.eu/education/eurydice/documents/eurybase/national_summary_sheets/047_EL_EN.pdf</a>
Hellenic Scholarship Foundation website (responsibility for student mobility)	<a href="http://www.iky.gr">www.iky.gr</a>
Ministry of Education Website	<a href="http://www.minedu.gov.gr/publications/docs/odhgies_simplhrwmatikes_100616.pdf">http://www.minedu.gov.gr/publications/docs/odhgies_simplhrwmatikes_100616.pdf</a>

### A3.3 Ireland

Types of source	Hyperlink
Study on Ireland's approach to satisfying labour market demand through migration in the period 2004-2010 with an emphasis is on non-EU economic immigration.	EMMA QUINN (2010) SATISFYING LABOUR DEMAND THROUGH MIGRATION: IRELAND, European Migration Network
Annual Report of the recognition service 2010 from the Qualifications Recognition web-site.	National Qualifications Authority of Ireland (2010) Qualifications Recognition at the National Qualifications Authority of Ireland, <a href="http://www.qualificationsrecognition.ie/recognition/Publications">http://www.qualificationsrecognition.ie/recognition/Publications</a>
Document containing information on: national legislation, bilateral/ regional recognition agreements and the recognition practice in Ireland.	NATIONAL ACTION PLAN FOR RECOGNITION – IRELAND, <a href="http://www.qualificationsrecognition.ie/recognition/Publications/documents/NationalActionPlanforRecognition-Final.pdf">http://www.qualificationsrecognition.ie/recognition/Publications/documents/NationalActionPlanforRecognition-Final.pdf</a>
The paper, prepared by the National Qualifications Authority of Ireland, outlines of the national policy approach to the recognition of international awards and sets out the current procedures in relation to their recognition.	National Policy Approach to the Recognition of International Awards in Ireland, June 2004, <a href="http://www.qualificationsrecognition.ie/recognition/pdfs/npri_awards.pdf">www.qualificationsrecognition.ie/recognition/pdfs/npri_awards.pdf</a>
This is the EMN's study that investigates managed migration and the labour market in Ireland focussing on the following areas: medicine, nursing, dentistry, dental nursing, psychology, nursing and midwifery, physiotherapy, pharmacy and chiropody/podiatriy.	EMMA QUINN (2006, modified in 2007) MANAGED MIGRATION AND THE LABOUR MARKET – THE HEALTH SECTOR IN IRELAND EMMA QUINN, European Migration Network, p.23, <a href="http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do;jsessionid=02043D830AFDBC00CA0E11FF178AD4C7?entryTitle=10_Managed+Migration+and+the+Labour+Market+-+The+HEALTH+SECTOR">http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do;jsessionid=02043D830AFDBC00CA0E11FF178AD4C7?entryTitle=10_Managed Migration and the Labour Market - The HEALTH SECTOR</a>
Report prepared by the	Emma Quinn and Philip J. O'Connell (2006) Conditions of Entry and Residence of

Irish National Contact Point of the European Migration Network.	Third Country Highly-Skilled Workers in Ireland, European Migration Network, <a href="http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do;jsessionid=02043D830AFDBC00CA0E11FF178AD4C7?entryTitle=08_Conditions of entry and residence of Third Country HIGHLY-SKILLED WORKERS in the EU">http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do;jsessionid=02043D830AFDBC00CA0E11FF178AD4C7?entryTitle=08_Conditions of entry and residence of Third Country HIGHLY-SKILLED WORKERS in the EU</a>
Engineers Ireland website:	<a href="http://www.engineersireland.ie/membership/apply-for-a-title/international-agreements/">http://www.engineersireland.ie/membership/apply-for-a-title/international-agreements/</a>
The Migration Information Source website, which provides data from numerous global organizations and governments, and global analysis of international migration and refugee trends.	Martin Ruhs (2009) Ireland: From Rapid Immigration to Recession, Centre on Migration, Policy and Society (COMPAS) Oxford University, updated by Emma Quinn, Economic and Social Research Institute, Dublin, <a href="http://www.migrationinformation.org/USfocus/display.cfm?ID=740">http://www.migrationinformation.org/USfocus/display.cfm?ID=740</a>

### A3.4 Italy

Types of source	Hyperlink
Website of the Fondazione Migrantes which is a catholic foundation aiming at providing assistance to immigrants	<a href="http://www.chiesacattolica.it/ci_new_v3/s2magazine/index1.jsp?idPagina=41">http://www.chiesacattolica.it/ci_new_v3/s2magazine/index1.jsp?idPagina=41</a>
Website of the Centro Nazionale Opere Salesiane, other religious organisation	<a href="http://www.cnos.org/cnos/index.php?option=com_content&amp;view=article&amp;id=418:migrazione-e-mobilita-degli-studenti-universitari-il-caso-italiano-nel-quadro-internazionale&amp;catid=35:spunti-e-appunti&amp;Itemid=78">http://www.cnos.org/cnos/index.php?option=com_content&amp;view=article&amp;id=418:migrazione-e-mobilita-degli-studenti-universitari-il-caso-italiano-nel-quadro-internazionale&amp;catid=35:spunti-e-appunti&amp;Itemid=78</a>
Eurostat	<a href="http://epp.eurostat.ec.europa.eu/tgm/refreshTableAction.do?tab=table&amp;plugin=1&amp;pcode=tps00064&amp;language=en">http://epp.eurostat.ec.europa.eu/tgm/refreshTableAction.do?tab=table&amp;plugin=1&amp;pcode=tps00064&amp;language=en</a>
Eurostat	<a href="http://epp.eurostat.ec.europa.eu/tgm/refreshTableAction.do;jsessionid=9ea7971b30da0c7089ba4a6441e99fbaced75db1e71a.e34RaNaLaN0Mc40LcheTaxiLbN8Re0?tab=table&amp;plugin=1&amp;pcode=tps00064&amp;language=en">http://epp.eurostat.ec.europa.eu/tgm/refreshTableAction.do;jsessionid=9ea7971b30da0c7089ba4a6441e99fbaced75db1e71a.e34RaNaLaN0Mc40LcheTaxiLbN8Re0?tab=table&amp;plugin=1&amp;pcode=tps00064&amp;language=en</a>
OECD statistics	<a href="http://www.oecd-ilibrary.org/docserver/download/fulltext/8110101e.pdf?expires=1302008924&amp;id=0000&amp;accname=ocid195693&amp;checksum=D7D2BE0A02B8E71333A6CA28770D87CF">http://www.oecd-ilibrary.org/docserver/download/fulltext/8110101e.pdf?expires=1302008924&amp;id=0000&amp;accname=ocid195693&amp;checksum=D7D2BE0A02B8E71333A6CA28770D87CF</a>
OECD statistics	<a href="http://www.oecd.org/dataoecd/6/56/45594926.xls">www.oecd.org/dataoecd/6/56/45594926.xls</a>
Document published by the Italian EMN contact point on migration policies, qualified positions and health sector	<a href="http://www.emnitaly.it/down/ev-52-07.pdf">http://www.emnitaly.it/down/ev-52-07.pdf</a>
EMN study, Italy report, on satisfying the labour demand through migration	<a href="http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do;jsessionid=F1A7C3E756D9D2D65D2EA465A06BA149?entryTitle=01_Satisfying LABOUR DEMAND through migration">http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do;jsessionid=F1A7C3E756D9D2D65D2EA465A06BA149?entryTitle=01_Satisfying LABOUR DEMAND through migration</a>
Website of the Ministry of foreign affairs, page on the bilateral agreements for recognition of qualifications	<a href="http://www.esteri.it/MAE/EN/Politica_Estera/Cultura/Universita/Riconoscimento_titoli_studio/Accordi_governativi.htm?LANG=EN">http://www.esteri.it/MAE/EN/Politica_Estera/Cultura/Universita/Riconoscimento_titoli_studio/Accordi_governativi.htm?LANG=EN</a>
Website of the Ministry of Employment and social policies, page on bilateral agreements for the regulation and management of migration flows	<a href="http://www.lavoro.gov.it/Lavoro/md/AreaSociale/Immigrazione/flussi_migratori/">http://www.lavoro.gov.it/Lavoro/md/AreaSociale/Immigrazione/flussi_migratori/</a>
Centro Informazioni Mobilita	<a href="http://www.cimea.it/default.aspx?IDC=31">http://www.cimea.it/default.aspx?IDC=31</a>

Equivalenze Accademiche, website providing information and contact on recognition of educational and professional qualifications	
Website of the Ministry of University and Research, page on information for the recognition of educational and professional qualifications	<a href="http://www.miur.it/0002Univer/0052Cooper/0069Titoli/0359Il_ric/index_cf2.htm">http://www.miur.it/0002Univer/0052Cooper/0069Titoli/0359Il_ric/index_cf2.htm</a>
Website of the Italian Qualification Framework	<a href="http://www.quadrodeititoli.it/qti.aspx?IDL=2&amp;par=319">http://www.quadrodeititoli.it/qti.aspx?IDL=2&amp;par=319</a>
EMN study, Italy report, on conditions of entry and residence of third country highly skilled in the EU	<a href="http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do?jsessionid=F1A7C3E756D9D2D65D2EA465A06BA149?entryTitle=08_Conditions of entry and residence of Third Country HIGHLY-SKILLED WORKERS in the EU">http://emn.intrasoft-intl.com/Downloads/prepareShowFiles.do?jsessionid=F1A7C3E756D9D2D65D2EA465A06BA149?entryTitle=08_Conditions of entry and residence of Third Country HIGHLY-SKILLED WORKERS in the EU</a>
Research on qualified and technical migration in Italy, published by the National Institute for Research on Population and Social Policies	<a href="http://www.spazicomuni.it/spazicomuni/sc_files/File/Migrazioni%20qualificate%20e%20migrazioni%20di%20tecnici.pdf">http://www.spazicomuni.it/spazicomuni/sc_files/File/Migrazioni%20qualificate%20e%20migrazioni%20di%20tecnici.pdf</a>

### A3.5 Malta

Types of source	Hyperlink
Malta Qualifications Council	<a href="http://www.mqc.gov.mt/about-us?!=1">http://www.mqc.gov.mt/about-us?!=1</a>
- Malta Qualifications Recognition Information Centre (MQRIC)	<a href="http://www.education.gov.mt/edu/mqric/mqric.htm">http://www.education.gov.mt/edu/mqric/mqric.htm</a>
European Working Conditions Observatory	<a href="http://www.eurofound.europa.eu/ewco/studies/tn0701038s/mt0701039q.htm">http://www.eurofound.europa.eu/ewco/studies/tn0701038s/mt0701039q.htm</a>
National Statistics Office	<a href="http://www.nso.gov.mt/statdoc/document_view.aspx?id=1991&amp;backurl=/themes/theme_page.aspx">http://www.nso.gov.mt/statdoc/document_view.aspx?id=1991&amp;backurl=/themes/theme_page.aspx</a>
National Statistics Office - DEMOGRAPHIC REVIEW 2009	<a href="http://www.nso.gov.mt/statdoc/document_file.aspx?id=2840">http://www.nso.gov.mt/statdoc/document_file.aspx?id=2840</a>
Further and higher education strategy 2020	<a href="https://www.nche.gov.mt/MediaCenter/PDFs/1_F&amp;H%20Strategy%202020%20NCHE%20Recommendations.pdf">https://www.nche.gov.mt/MediaCenter/PDFs/1_F&amp;H%20Strategy%202020%20NCHE%20Recommendations.pdf</a>
Vision 2015	<a href="http://vision2015.gov.mt/the-project">http://vision2015.gov.mt/the-project</a>
Malta Independent	<a href="http://www.independent.com.mt/news2.asp?artid=101055">http://www.independent.com.mt/news2.asp?artid=101055</a>
European Industrial Relations Observatory Online	<a href="http://www.eurofound.europa.eu/eiro/2006/02/feature/eu0602204f.htm">http://www.eurofound.europa.eu/eiro/2006/02/feature/eu0602204f.htm</a>
Legal Malta	<a href="http://www.legal-malta.com/immigration/work-permits.htm">http://www.legal-malta.com/immigration/work-permits.htm</a>
GHK report – Mutual Learning Programme	<a href="http://www.grupa484.org.rs/czm/radne_migracije/final%20formatted%20pdf/Malta_peer_comments_paper.pdf">http://www.grupa484.org.rs/czm/radne_migracije/final%20formatted%20pdf/Malta_peer_comments_paper.pdf</a>
International Organisation for Migration	<a href="http://www.migrantservicecentres.org/userfile/Destination%20Country%20Fact%20Sheet%20MALTA.pdf">http://www.migrantservicecentres.org/userfile/Destination%20Country%20Fact%20Sheet%20MALTA.pdf</a>
ENIC-NARIC	<a href="http://www.enic-naric.net/index.aspx?c=Malta#Policies and Procedures for the">http://www.enic-naric.net/index.aspx?c=Malta#Policies and Procedures for the</a>

## Recognition of Foreign Qualifications0

## A3.6 The Netherlands

Types of source	Hyperlink
NUFFIC – Dutch Organisation for International cooperation in higher education	<a href="http://www.nuffic.nl/international-students/dutch-education/key-figures">http://www.nuffic.nl/international-students/dutch-education/key-figures</a> <a href="http://www.nuffic.nl/nederlandse-organisaties/nieuws-evenementen/nieuws-archief/nieuws-archief-2008/november-1/internationaliseringsagenda-kwart-studenten-de-grens-over">http://www.nuffic.nl/nederlandse-organisaties/nieuws-evenementen/nieuws-archief/nieuws-archief-2008/november-1/internationaliseringsagenda-kwart-studenten-de-grens-over</a>
News website Rotterdam	<a href="http://www.cos.rotterdam.nl/Rotterdam/Openbaar/Diensten/COS/MOR/PDF/Burgerschapsbriefing%20Kennismigranten%20-%201%20Kennismigranten%20in%20Rotterdam.pdf">http://www.cos.rotterdam.nl/Rotterdam/Openbaar/Diensten/COS/MOR/PDF/Burgerschapsbriefing%20Kennismigranten%20-%201%20Kennismigranten%20in%20Rotterdam.pdf</a>
News website	<a href="http://www.als-kennismigrant-naar-nederland.nl/">http://www.als-kennismigrant-naar-nederland.nl/</a>
TV channel	<a href="http://www.schooltv.nl/eigenwijzer/project/2994185/debat-kennismigratie/2157348/maatschappijleer/item/3000982/de-kennismigrantenregeling/">http://www.schooltv.nl/eigenwijzer/project/2994185/debat-kennismigratie/2157348/maatschappijleer/item/3000982/de-kennismigrantenregeling/</a>
MBO Council	<a href="http://www.mboraad.nl/?page/530112/About+us.aspx">http://www.mboraad.nl/?page/530112/About+us.aspx</a> <a href="http://www.mboraad.nl/media/uploads/In%20Nieuwsbrief%20MBO%20Raad%20o.a.%20Internationaliseringsagenda%20mbo.htm">http://www.mboraad.nl/media/uploads/In%20Nieuwsbrief%20MBO%20Raad%20o.a.%20Internationaliseringsagenda%20mbo.htm</a>
Central statistics office	<a href="http://www.cbs.nl/nl-NL/menu/themas/bevolking/publicaties/artikelen/archief/2010/2010-3080-wm.htm">http://www.cbs.nl/nl-NL/menu/themas/bevolking/publicaties/artikelen/archief/2010/2010-3080-wm.htm</a> <a href="http://www.cbs.nl/NR/rdonlyres/B9A2443E-85D4-4C92-8E63-FAB132467D9D/0/2009k4b15p45art.pdf">http://www.cbs.nl/NR/rdonlyres/B9A2443E-85D4-4C92-8E63-FAB132467D9D/0/2009k4b15p45art.pdf</a> <a href="http://cbs.nl/NR/rdonlyres/321B3C72-39D6-48A9-B3EC-975C5B79F56B/0/2009k1v4p19art.pdf">http://cbs.nl/NR/rdonlyres/321B3C72-39D6-48A9-B3EC-975C5B79F56B/0/2009k1v4p19art.pdf</a> <a href="http://cbs.nl/nl-NL/menu/themas/arbeid-sociale-zekerheid/publicaties/artikelen/archief/2010/2010-3028-wm.htm">http://cbs.nl/nl-NL/menu/themas/arbeid-sociale-zekerheid/publicaties/artikelen/archief/2010/2010-3028-wm.htm</a>
Websites of some universities Groningen Medical University - Utrecht	<a href="http://www.rug.nl/prospectivestudents/universityofgroningen/services/Code_of_Conduct.pdf">http://www.rug.nl/prospectivestudents/universityofgroningen/services/Code_of_Conduct.pdf</a> <a href="http://www.umcutrecht.nl/onderwijs/opleidingen/biomedisch/commissieinstroombuitenlandseartsen.htm">http://www.umcutrecht.nl/onderwijs/opleidingen/biomedisch/commissieinstroombuitenlandseartsen.htm</a>

## A3.7 Poland

Types of source	Hyperlink
A study examining the scale of the real outflow of medical personnel from public and private health care units in Poland.	Confidential: Pawel Kaczmarczyk, Anna Janicka, Adelajda Kołodziejska, Agnieszka Makulec (2010) Contemporary migration of Polish medical specialists: the scale, structure and impact on the functioning of the health care system. Research project report No N N114 116935, Warsaw.
Report based on 15 interviews conducted in the macro phase of the MoHProf project with key stakeholders represented different institutions involved in management of the health system in Poland or studying different aspects of its functioning. The main issued included: general information on the	Confidential: Centre of Migration Research Warsaw University (2009) National report: Poland. Macro research,

health system; supply of health professionals and their education, policy framework and migration flows in the sector.	
Data on the number of foreign students in Poland.	Central Statistical Office (2010) Note on higher education in Poland, <a href="http://www.stat.gov.pl/cps/rde/xbcrgus/PUBL_e_not_nt_szkol_wyzszych_w_Polsce.pdf">http://www.stat.gov.pl/cps/rde/xbcrgus/PUBL_e_not_nt_szkol_wyzszych_w_Polsce.pdf</a>
Interview carried out during the study on EU-China student and academic staff mobility (Order 96 for DG EAC).	Interview with the Kozminski University for the study on EU-China student and academic staff mobility.
Web-site of the mapping study on the European Union Member States Higher Education External Cooperation Programmes and Policies.	External Education Policies – Poland, <a href="http://www.mapping-he.eu/Programmes/ProgramDetails.aspx?&amp;countryid=25&amp;programid=P217">http://www.mapping-he.eu/Programmes/ProgramDetails.aspx?&amp;countryid=25&amp;programid=P217</a>
Web-site of the Ministry of Science and higher Education (ENIC-NARIC Centre) on academic and vocational mobility.	<a href="http://www.nauka.gov.pl/szkolnictwo-wyzsze/system-szkolnictwa-wyzszego/mobilnosc-akademicka-i-zawodowa/uznawanie-wykształcenia/akty-prawne/">http://www.nauka.gov.pl/szkolnictwo-wyzsze/system-szkolnictwa-wyzszego/mobilnosc-akademicka-i-zawodowa/uznawanie-wykształcenia/akty-prawne/</a>
EMN website, report prepared by the Polish National Contact Point to the European Migration Network on organisation of asylum and migration policies.	The organisation of asylum and migration policies in Poland, European Migration Network (2009), <a href="http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=EA586AD491FC585833929D92FAB69050?fileID=882">http://emn.intrasoft-intl.com/Downloads/download.do;jsessionid=EA586AD491FC585833929D92FAB69050?fileID=882</a>
KPMG Report on Polish workforce migration.	Witold Jagiello, Sabina Wesierska (2007) Workforce Migration - Opportunity or Threat? <a href="http://www.kpmg.pl/dbfetch/52616e646f6d4956977aa1721c4211b45569c07affcdc1f14e3ca2385509adff/migracja_pracownik_w.pdf">http://www.kpmg.pl/dbfetch/52616e646f6d4956977aa1721c4211b45569c07affcdc1f14e3ca2385509adff/migracja_pracownik_w.pdf</a> , p.17.
Article on migration of high-skilled workers from and to Poland on Bankier.pl portal.	Pawel Kaczmarczyk (2007) Migration of high-skilled workers, Centre of Migration Research, Warsaw University, <a href="http://www.bankier.pl/wiadomosc/Migracje-osob-z-wysokimi-kwalifikacjami-1596370.html">http://www.bankier.pl/wiadomosc/Migracje-osob-z-wysokimi-kwalifikacjami-1596370.html</a>
Article on e-Gospodarka web-site (devoted to economy-related issues)	Immigrants in Poland', e-Gospodarka, 31.12.2008, <a href="http://www.egospodarka.pl/36792,Imigranci-w-Polsce-2008,2,39,1.html">http://www.egospodarka.pl/36792,Imigranci-w-Polsce-2008,2,39,1.html</a>
Guide on the recognition of foreign education in Poland. Information similar to the one on the Ministry's web-site.	Regional Employment Office (2008) Recognition of foreign education in Poland, Centre for Information and Career Planning, Warsaw, <a href="http://www.wup.mazowsze.pl/ciz/teczki/uznawalnosc_wykształcenia.pdf">http://www.wup.mazowsze.pl/ciz/teczki/uznawalnosc_wykształcenia.pdf</a>
Interview carried out during the study on EU-China student and academic staff mobility (Order 96 for DG EAC).	Interview with the Ministry for Science and Higher Education in Poland for the study on EU-China student and academic staff mobility.
Publication prepared under the project of the Ministry of National Education, 'Stocktaking of competences and qualifications for the Polish labour market and the development of a national qualifications framework'	'From the European to the National Qualifications Framework', , <a href="http://www.krk.org.pl/pl/publikacje2">http://www.krk.org.pl/pl/publikacje2</a>
Polish Press Agency on migration of Polish doctors to the UK.	<a href="http://www.rynekzdrowia.pl/Finanse-i-zarzadzanie/W-Wielkiej-Brytanii-pracuje-18-tys-polskich-lekarzy,10365,1.html">http://www.rynekzdrowia.pl/Finanse-i-zarzadzanie/W-Wielkiej-Brytanii-pracuje-18-tys-polskich-lekarzy,10365,1.html</a> [12.10.09].
Results of the project on educational migrations to Poland carried out by the Centre for Migration Research, Warsaw University Institute of Social Policy.	Maciej Duszczyk, Cezary Żołędowski (2008) Foreign students in Poland - the reasons for their arrival, evaluation of stay and plans for the future, <a href="http://sites.google.com/site/biuletynmigracyjny/archiwum-html/biuletyn-migracyjny-26/bm26art1">http://sites.google.com/site/biuletynmigracyjny/archiwum-html/biuletyn-migracyjny-26/bm26art1</a>
Polish Press Agency information.	'Poland lacks students from foreign countries', 27 July 2009,

[http://praca.gazetaprawna.pl/artykuly/340003,w\\_polsce\\_brakuje\\_studntow\\_z\\_obcych\\_krajow.html](http://praca.gazetaprawna.pl/artykuly/340003,w_polsce_brakuje_studntow_z_obcych_krajow.html) quoted from External Education Policies – Poland, <http://www.atlas.iienetwork.org/?p=48027>

### A3.8 United Kingdom

Type of Source	Hyperlink
Migration Watch	<a href="http://www.migrationwatchuk.org/briefingPaper/document/28">http://www.migrationwatchuk.org/briefingPaper/document/28</a> <a href="http://www.migrationwatchuk.org/briefingPaper/document/209">http://www.migrationwatchuk.org/briefingPaper/document/209</a>
British Council	<a href="http://www.britishcouncil.org/eumd-pmi-about.htm">http://www.britishcouncil.org/eumd-pmi-about.htm</a> <a href="http://www.britishcouncil.org/eumd-pmi-market-diversification.htm">http://www.britishcouncil.org/eumd-pmi-market-diversification.htm</a>
Home Office	<a href="http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/immigration-asylum-research/control-immigration-q4-2010/control-immigration-q4-2010?view=Binary">http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/immigration-asylum-research/control-immigration-q4-2010/control-immigration-q4-2010?view=Binary</a>
- Entry requirements for UK study	- <a href="http://www.educationuk.org/Article/Entry-requirements-for-UK-study">http://www.educationuk.org/Article/Entry-requirements-for-UK-study</a>
UK Border Agency	<a href="http://www.ukba.homeoffice.gov.uk/">www.ukba.homeoffice.gov.uk/</a>
Qualifications levels explained	<a href="http://www.direct.gov.uk/en/EducationAndLearning/QualificationsExplained/DG_10039017">http://www.direct.gov.uk/en/EducationAndLearning/QualificationsExplained/DG_10039017</a>
NQF	<a href="http://www.ofqual.gov.uk/qualification-and-assessment-framework/89-articles/250-explaining-the-national-qualifications-framework">http://www.ofqual.gov.uk/qualification-and-assessment-framework/89-articles/250-explaining-the-national-qualifications-framework</a>
Higher education qualifications framework	<a href="http://www.direct.gov.uk/en/EducationAndLearning/QualificationsExplained/DG_10039017">http://www.direct.gov.uk/en/EducationAndLearning/QualificationsExplained/DG_10039017</a>
NARIC website	<a href="http://www.naric.org.uk/">http://www.naric.org.uk/</a>
- Regulated professions in the UK	- <a href="http://www.europeopen.org.uk/index.asp?page=21">http://www.europeopen.org.uk/index.asp?page=21</a>
Business link	<a href="http://www.ukwelcomes.businesslink.gov.uk">www.ukwelcomes.businesslink.gov.uk</a>



## Annex 4 Organisations contacted

Country	Organisation	Interviewed (yes/no)
<b>Australia</b>	Department for Education Employment and Workplace Relations (Australia Education International)	Yes
	NOOSR National Office of Overseas Skills Recognition	Yes
	Australia Qualifications Framework Council	Yes
	AIG (Australia Industry Group)	Yes
<b>Germany</b>	DAAD – German Academic exchange service	No
	German Qualifications Framework office	No
	Tuerantuer Foundation Organization which helps migrants with recognition of qualifications; carries out research on issues with qualifications recognition in Germany	Yes
	Conference of the Ministers of Education (in charge of anabin database on comparison of foreign qualifications)	Yes
	European Migration Network Contact Point – Federal office for migration and refugees	No
<b>Greece</b>	D.O.A.T.A.P Hellenic NARIC	Yes
	IKY – State Scholarships Foundation	Yes
<b>Malta</b>	Malta Qualifications Council	Yes
<b>The Netherlands</b>	NUFFIC – ENIC/NARIC	Yes
	European Migration Network Contact Point - Immigration and Naturalization Service	No
	NVAO - Netherlands-Flemish Accreditation Organization	Yes
	COLO – National centre for expertise on vocational education	Yes
	Technical University Delft	No
	Technical University Eindhoven	No
<b>Ireland</b>	Qualifications Recognition National Qualifications Authority of Ireland	Yes
	Economic and Social Research Institute	Yes
	The Integration Centre	Yes
<b>Italy</b>	NARIC Italia	Yes
	National Institute for Research on Population and Social Policies	No
<b>Poland</b>	Institute for Educational Research – in charge of NQF development	Yes
	Ministry of Science and Higher Education	Yes
	Centre for Migration Studies	No
	Bureau for Academic Recognition and International Exchange – EQF Contact Point	Yes
<b>United Kingdom</b>	British Council	Yes
	NARIC UK	Yes
	European Migration Network Contact Point – UK Border Agency	No
	Scottish Credit and Qualifications Framework Partnership	Yes

## Annex 5 Topic guide for interviews

Main theme	Questions and prompts
Current role of qualifications in supporting mobility of <b>students</b>	<p>Do you see any issues that concern the international understanding of the qualifications awarded in your country with regard to promoting the mobility of students?</p> <p>Prompts:</p> <ul style="list-style-type: none"> <li>- If there is a strategy to internationalise higher education – do you think that your higher education qualifications are well understood abroad when it comes to their level and how they generally compare to qualifications in countries where you try to attract foreign students from?</li> <li>- The same question for vocational qualifications – especially post-secondary vocational qualifications that represent skilled worker status in your country.</li> <li>- Are there any issues regarding the recognition of qualifications to enter studies in your country with foreign qualifications? Any sign that maybe some foreign qualifications are not correctly recognised for entry?</li> <li>- Are there aspects of your education and training system that are often misunderstood from the viewpoint of foreign observers? Does this impact on the understanding of the qualification system? For example, some types or levels of qualifications?</li> </ul>
Existing obstacles in recognition of qualifications in the context of <b>student</b> mobility	<p>Do incoming students face difficulties in the recognition of their qualifications? What are the main issues:</p> <ul style="list-style-type: none"> <li>- Is the lack of information about how the level of their qualifications compared to the ones in your country an issue?</li> <li>- Is the difficulty to compare the content of qualifications an issue?</li> <li>- Is the variable quality assurance of their qualifications a problem?</li> <li>- Are the difficulties related to other aspects such as the lack of experience with recognition of education institutions, bureaucracy, etc.?</li> </ul> <p>Do students from your country who have studied abroad face difficulties in recognition of the qualifications they gained whilst abroad, when they want to pursue further studies in your country?</p> <ul style="list-style-type: none"> <li>- As above</li> </ul>
Current role of qualifications in supporting mobility of <b>workers</b>	<p>Based on the background research: Would you say that the role of qualifications in the national migration policy is well captured? (interviewers will use the information from the interim report)?</p> <p>Is there a link between the immigration policy (mobility from third countries) and qualifications and qualifications levels?</p> <p>Where there is an intention to attract highly qualified persons: is this exclusively related to higher education (academic) qualifications?</p> <ul style="list-style-type: none"> <li>- If not, how is the decision made whether a person with a vocational qualification applies as 'highly qualified': By comparing the qualification with the national qualifications structure/levels? Related to the complexity of the profession?</li> </ul>

	<p>Where there is an intention to attract professionals in specific occupations, how is the matching between the profile of the candidate and the requirements of the profession made:</p> <ul style="list-style-type: none"> <li>- Based on candidates qualifications? If so, how is the compatibility between the qualification and the professional requirements defined? Title of the qualification? Level of the qualification? Description of the qualification? Do you think that candidates from some countries are privileged because the understanding of their qualifications in your country is good?</li> <li>- Based on candidates prior working experience?</li> </ul>
<p><b>Relevance of particular qualifications characteristics</b></p> <p><b>Both students and workers' mobility</b></p>	<p>Which of these aspects (characteristics of qualifications) do you think are particularly useful for recognition of qualifications:</p> <ul style="list-style-type: none"> <li>- The level of a qualification in the national system (how it compares to other major qualifications – for example, from school education or academic qualifications)</li> <li>- The level of the qualification according to an internationally understood system of level (for example, the European qualifications framework)</li> <li>- The type of institution that awards the qualification – is it a public, private education provider or a private company etc.?</li> <li>- The description of competences that the qualification certifies</li> <li>- The fact that the qualification is quality assured – accredited, nationally recognised</li> <li>- The role of the Government in regulating the qualification</li> <li>- The role of professional bodies and sectors in regulating the qualification</li> <li>- Other</li> </ul>
<p>Existing obstacles in recognition of qualifications in the context of workers' mobility</p>	<p>In general, do you think it is straightforward to recognise foreign qualifications (from outside the EU)?</p> <ul style="list-style-type: none"> <li>- Academic qualifications?</li> <li>- Vocational qualifications?</li> </ul> <p>Are there differences according to countries where the qualification was awarded?</p> <p>If it is rather straightforward: why?</p> <p>If there are difficulties what are they linked to?</p> <ul style="list-style-type: none"> <li>- Not understanding the level of qualification? The type of qualification? The content of qualification? How the qualification compares to the qualifications in your own country?</li> <li>- Or other issues related to bureaucracy, lack of experience in recognising qualifications, etc.</li> </ul> <p>In countries where employers make the decision about deciding on whether migrants' qualifications are appropriate:</p> <ul style="list-style-type: none"> <li>- Do you observe that employers face difficulties in recognising migrants' qualifications?</li> <li>- Is there a lack of trust in foreign qualifications?</li> <li>- Are they asking for information about how to recognise foreign qualifications?</li> <li>- Are there tools/ guidelines that can help them to do so?</li> </ul>
<p>Qualifications versus professions</p>	<p>Are you aware of certain professions which have particularly well organised arrangements for the international mobility of professionals (worldwide)? – other than the professions in aviation, shipping or trucking (note: for all these professions we know that the certificates are internationally governed and recognised)</p>

Which ones?

Prompt the interviewee to give you information about how it works in the sector.

According to your understanding, what is the role of professions and professional experience in recognising qualifications? Which one matters most and why?

The (possible) added value of qualifications frameworks regarding the mobility of learners and workers

**Countries that have a qualifications framework in place:**

Is there any evidence that the qualifications framework has simplified or helped the recognition of qualifications?

If there is no evidence, what do you think is the general view of the added value that the NQF has produced in this area?

- How has mobility been supported by the NQF?

(the question will be first asked without prompts, the prompts below will only be used once the interviewee has given a first impression)

- The use of levels and linking with levels from other countries
- The existence of register(s) of qualifications
- The use of learning outcomes and the matching between a qualification and a professional profile
- Are frameworks particularly helpful for vocational qualifications? Academic qualifications?

**Countries that do not have a qualifications framework in place:**

What do you think would be the main added value of a qualifications framework to support the mobility of both students and workers? Why?

(the question will be first asked without prompts, the below prompts will only be used once the interviewee has given a first impression) amended as above

- The use of levels and linking with levels from other countries
- The existence of register(s)
- The use of learning outcomes and the matching between a qualification and a professional profile
- Would there be differences between the added value produced according to the type of qualifications concerned (vocational, academic?)

**All interviewees:**

Do you (or the organisations in charge of qualifications and recognition) take into account the existence of a qualifications framework in the country of origin of the candidate?

Do you (or the organisations in charge of qualifications and recognition) find it easier to recognise qualifications of people who come from countries where there is a qualifications framework in place?

Do you see the added value of the qualifications framework in communicating about the national education and training system abroad in order to improve the attractiveness of education and training?

The limitations of qualifications frameworks

**Countries that have a qualifications framework in place:**

Do you observe limitations in how a qualifications framework can contribute to supporting the mobility of workers and learners?

What are they?

**Countries that do not have a qualifications framework in place:**

Do you think there would be limitations in what a qualifications framework could achieve to support the mobility of workers and learners?

What are they?

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Additional comments Do you have any additional comments?

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